

PD4 Exh 11



SOM System Logic

M
Actavis

Overview

As required by 21 CFR 1301.74 (b), Actavis Pharmaceuticals, Inc. operates an order monitoring system that discloses suspicious orders of controlled substances.

Additionally, Actavis employs a SOM program that consists of customer vetting, order monitoring, and order investigation and disposition.

Actavis vets all prospective customers and requires the completion of a detailed questionnaire. Potential customers provide information relative to their business type, customer base (e.g. nursing homes, retail pharmacy locations, etc.), industry membership (e.g. HDMA), registrations (i.e. DEA and State Boards) and purchasing commitment. Actavis customers must order multiple product lines and cannot exclusively order controlled substances. Actavis customers are primarily wholesalers, chains, distributors and mail order companies. Actavis does not sell direct to pharmacy locations.

Overview (continued)

Actavis utilizes an order monitoring component of SAP to evaluate a variety of order characteristics to intelligently determine whether a controlled substance order should be “suspended”. These characteristics include order size, ordering frequency, ordering pattern, and similar attributes that assist in evaluating the likely “suspiciousness” of an order. The Actavis Customer Relations Department performs an initial review of the suspended order, at this point considered an “order of interest,” and contacts the customer to request additional information/order justification.

SOMS monitors customer ordering behavior based on predefined benchmarks for Customer, Class of Trade, Order and Month to Date quantities. If an order line exceeds any of the four benchmarks the order is blocked for delivery.

Controlled Substance Compliance is responsible for the investigation and disposition of controlled substance “orders of interest”. These orders are thoroughly investigated and if substantiated by the customer, they are released within the SAP System and filled by the Gurnee, IL Distribution Center. If an order is deemed suspicious, the customer’s order is cancelled and an investigation report is completed. All suspicious orders are reported to the DEA Chicago Field Office.



Transaction ZVMUL SOMS/OMS table – Multiplier Data Based on Class of Trade

No. field is used only for OMS

Multiplier for SOMS

Multiplier for OMS

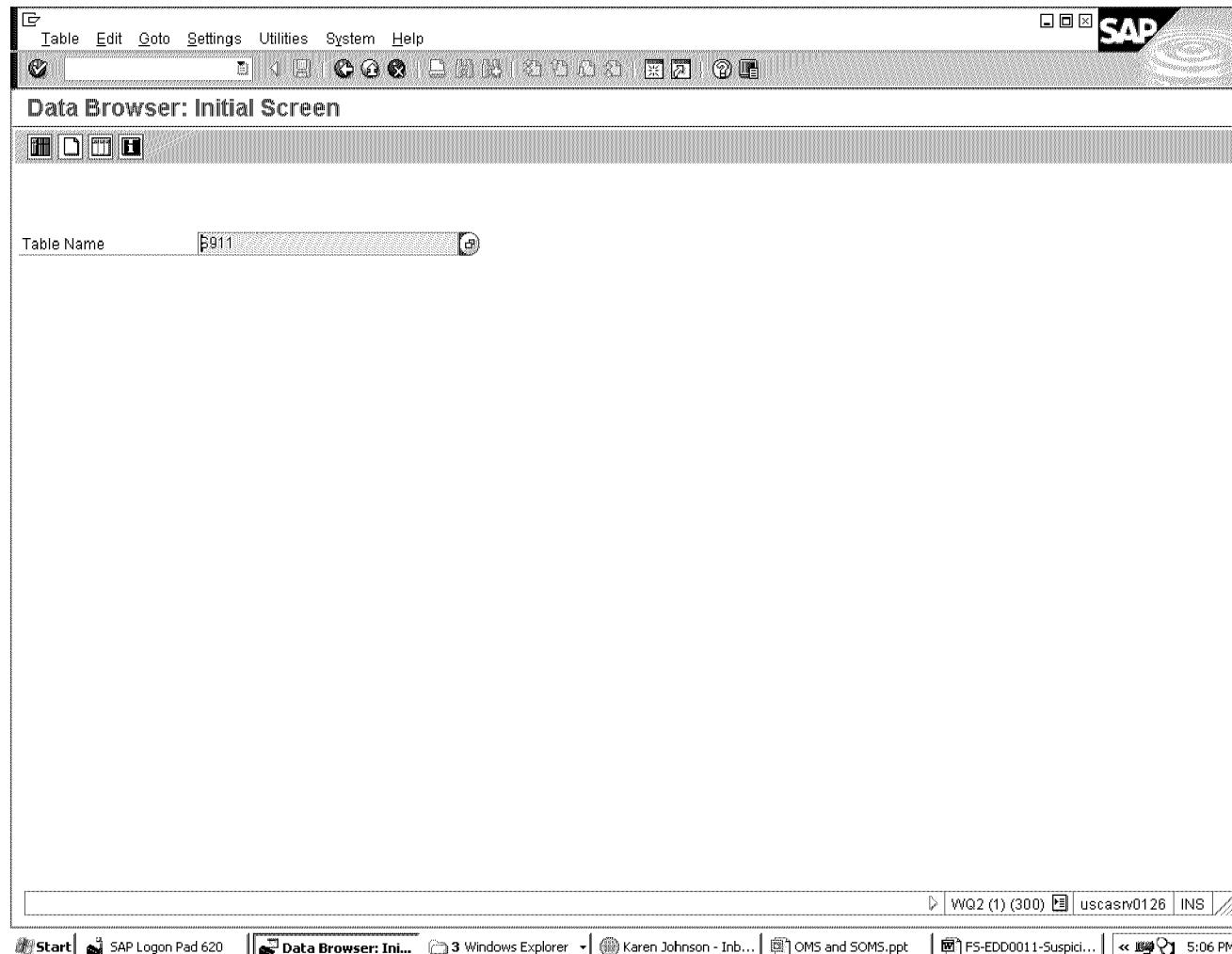
Class..	No.	SOMS.Mul	OMS.Mult
	999	999.000	999.000
CCS	999	999.000	999.000
CHAIN	144	6.000	3.000
CLIN	999	999.000	999.000
CLOSE	999	999.000	999.000
DIAL	999	999.000	999.000
DISTR	36	3.000	1.500
DOD	999	999.000	999.000
ECOM	999	999.000	999.000
EXP	999	999.000	999.000
GPO	999	999.000	999.000
GROUP	999	999.000	999.000
HMOMC	999	999.000	999.000
HOSPT	999	999.000	999.000
MAIL0	144	3.000	3.000
MANF	999	999.000	999.000
MDCD	999	999.000	999.000
MDDDC	999	999.000	999.000
NURSH	999	999.000	999.000
NWCH	999	999.000	999.000
OGA	999	999.000	999.000
OTHER	999	999.000	999.000

Position... Entry 1 of 36

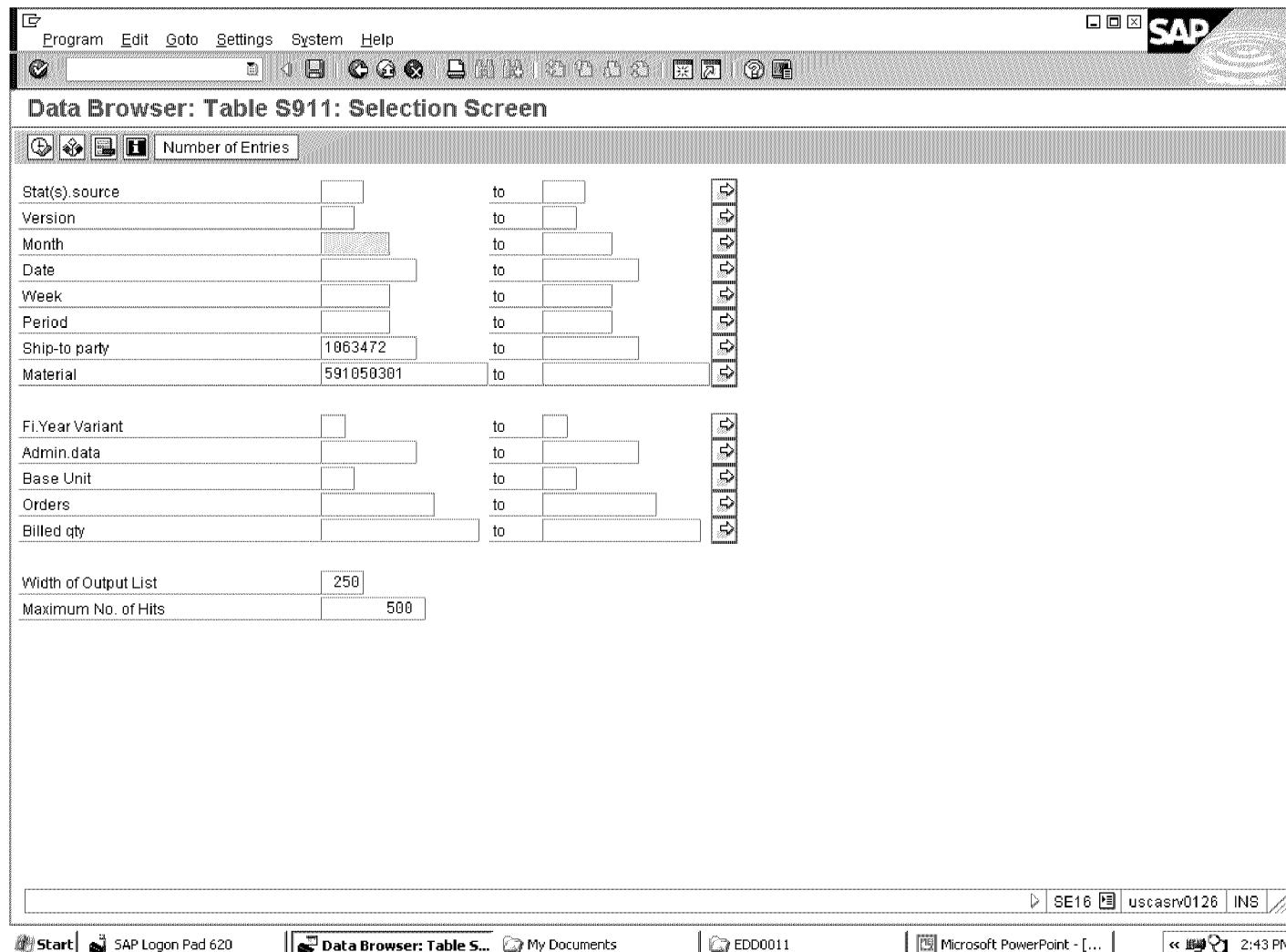
WQ2 (1) (300) uscasrv0126 INS

Start SAP Logon Pad 620 Change View "SOMS... SAP - Production Support Karen Johnson - Inbox - ... Microsoft PowerPoint - [...] 2:29 PM

Transaction SE16 S911 Table



This table captures number of orders and billed quantity data for Ship-to party customer and Material by month.



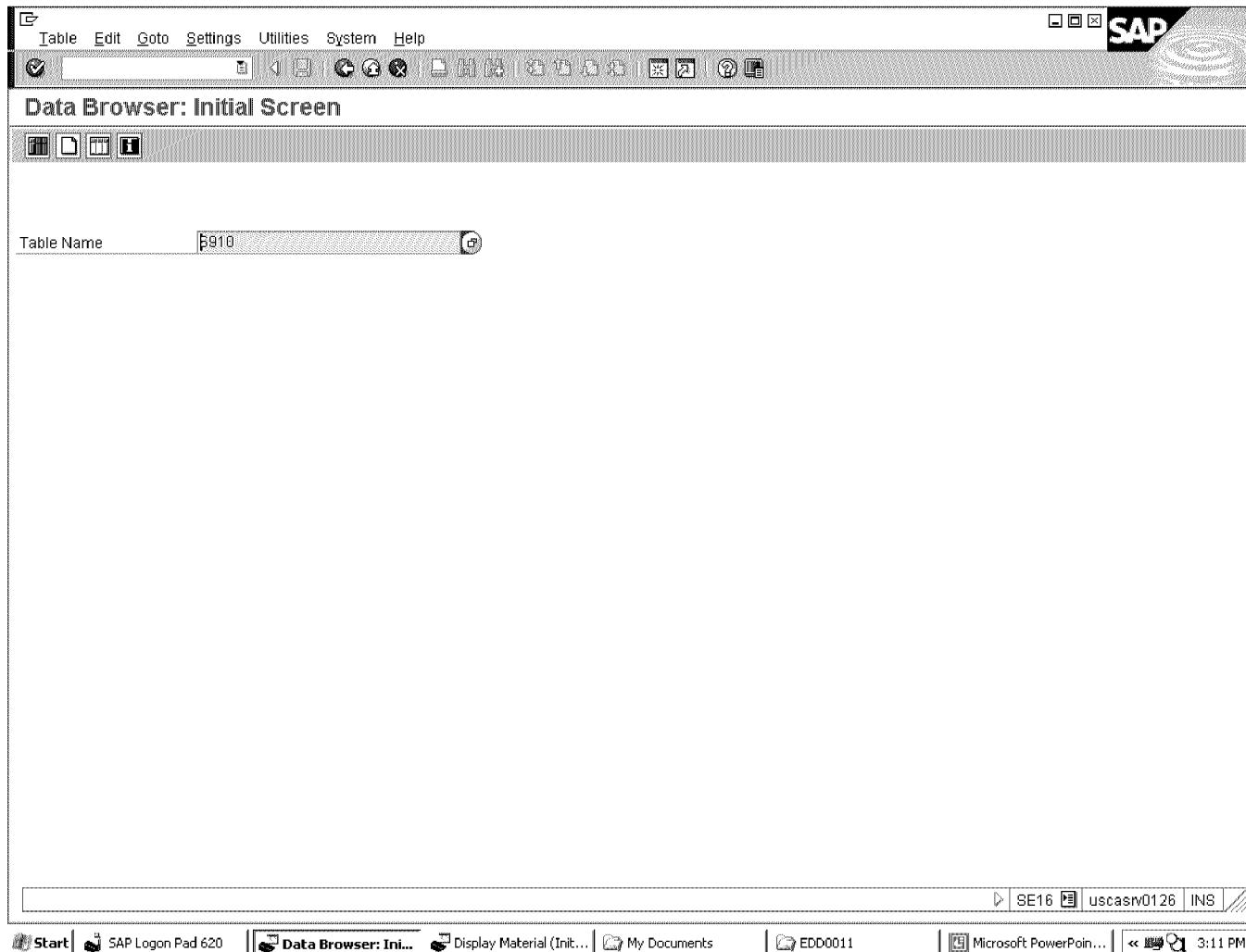
Example: Selection criteria Ship-to party and Material.

The screenshot shows the SAP Data Browser interface with the title "Data Browser: Table S911 Select Entries" and a page number "32". The table has the following columns:

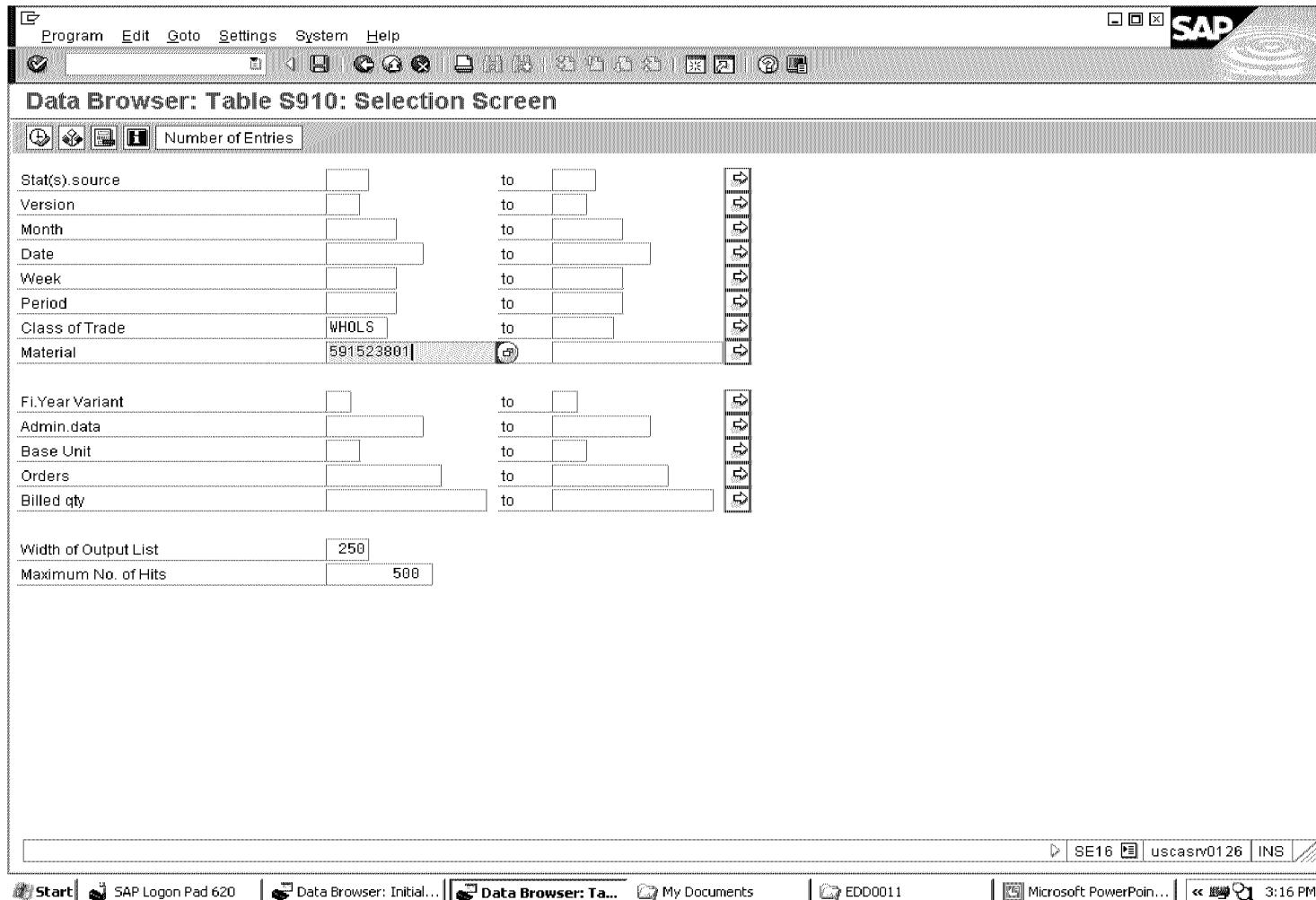
Month	Date	Week	Period	Ship-to party	Material	Fis Year	Variant	Admin data	Base Unit	Orders	Billed qty.
200304	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	4	696.000
200305	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	9	564.000
200306	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	10	516.000
200307	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	10	576.000
200308	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	8	576.000
200309	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	9	528.000
200310	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	9	516.000
200311	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	7	492.000
200312	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	9	768.000
200401	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	6	516.000
200402	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	6	336.000
200403	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	8	564.000
200405	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	4	168.000
200406	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	8	552.000
200407	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	9	552.000
200408	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	9	528.000
200409	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	9	420.000
200410	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	7	396.000
200411	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	8	432.000
200412	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	4	468.000
200501	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	7	504.000
200502	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	7	360.000
200503	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	8	420.000
200504	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	7	504.000
200505	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	8	360.000
200506	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	9	432.000
200507	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	8	396.000
200508	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	9	540.000
200509	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	8	336.000
200510	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	8	456.000
200511	00/00/0000	000000	000000	0001063472	000000000591523801			0000000000	BTL	9	324.000

Once the order has been saved the Orders field is populated and when it has been invoiced the Billed qty. field is populated. The Table contains data by Per Month, Ship-to party, Material, Number of Orders and Billed qty. This table is used to calculate the values displayed in the ZVCUSTDATA table for Average month quantities and Average order quantities for rolling twelve months.

Transaction SE16 S910 Table



This table captures number of orders and billed quantity data for Class of Trade and Material by month.



Example: Selection criteria Class of Trade and Material

The screenshot shows the SAP Data Browser interface with the title "Data Browser: Table S910 Select Entries" and a status bar indicating "35" entries. The table has 12 columns: Month, Date, Week, Period, Class of Trade, Material, Fin Year Variant, Admin data, Base Unit, Orders, and Billed qty. The data spans from 200304 to 200510. The "Orders" and "Billed qty" columns are highlighted with ovals. The "Billed qty" column contains values such as 5,239.000, 8,191.000, 4,365.000, etc.

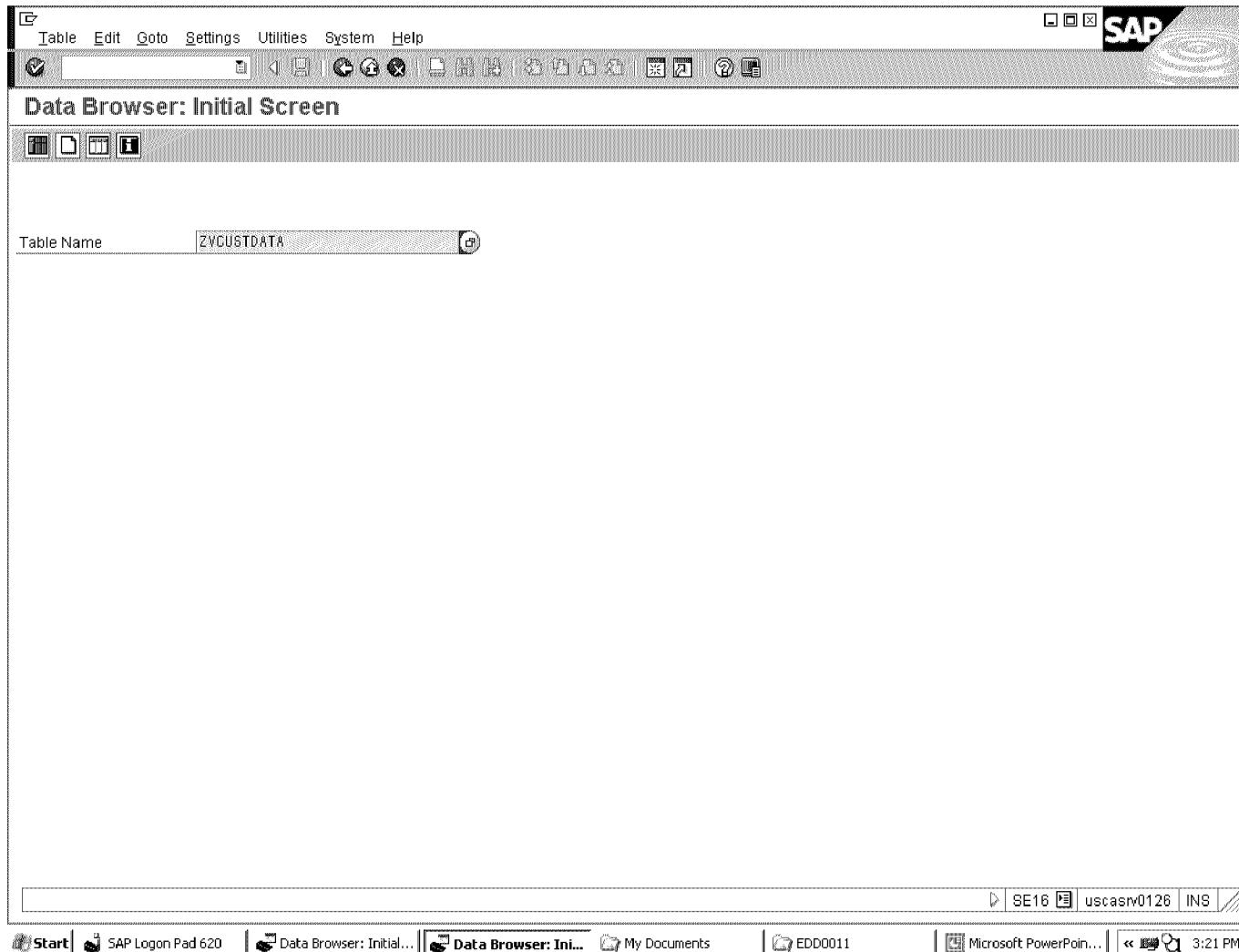
Month	Date	Week	Period	Class of Trade	Material	Fin Year Variant	Admin data	Base Unit	Orders	Billed qty
200304	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	138	5,239.000
200305	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	204	8,191.000
200306	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	135	4,365.000
200307	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	145	5,054.000
200308	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	213	7,436.000
200309	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	261	8,453.000
200310	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	339	19,069.000
200311	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	229	11,439.000
200312	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	186	13,030.000
200401	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	83	4,474.000
200402	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	55	1,171.000
200403	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	98	2,101.000
200404	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000		1	0.000
200405	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	447-	2,788.120
200406	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	707-	6,363.100
200407	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	252	7,227.000
200408	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	234	7,113.000
200409	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	262	5,893.000
200410	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	268	10,348.000
200411	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	242	6,339.000
200412	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	159	7,046.000
200501	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	127	4,725.000
200502	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	176	5,890.000
200503	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	235	6,313.000
200504	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	170	6,873.000
200505	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	195	6,241.000
200506	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	188	6,752.000
200507	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	169	5,974.000
200508	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	205	6,722.000
200509	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	153	7,285.000
200510	00/00/0000	000000	000000	WHOLS	000000000591523801		0000000000	BTL	158	6,152.000

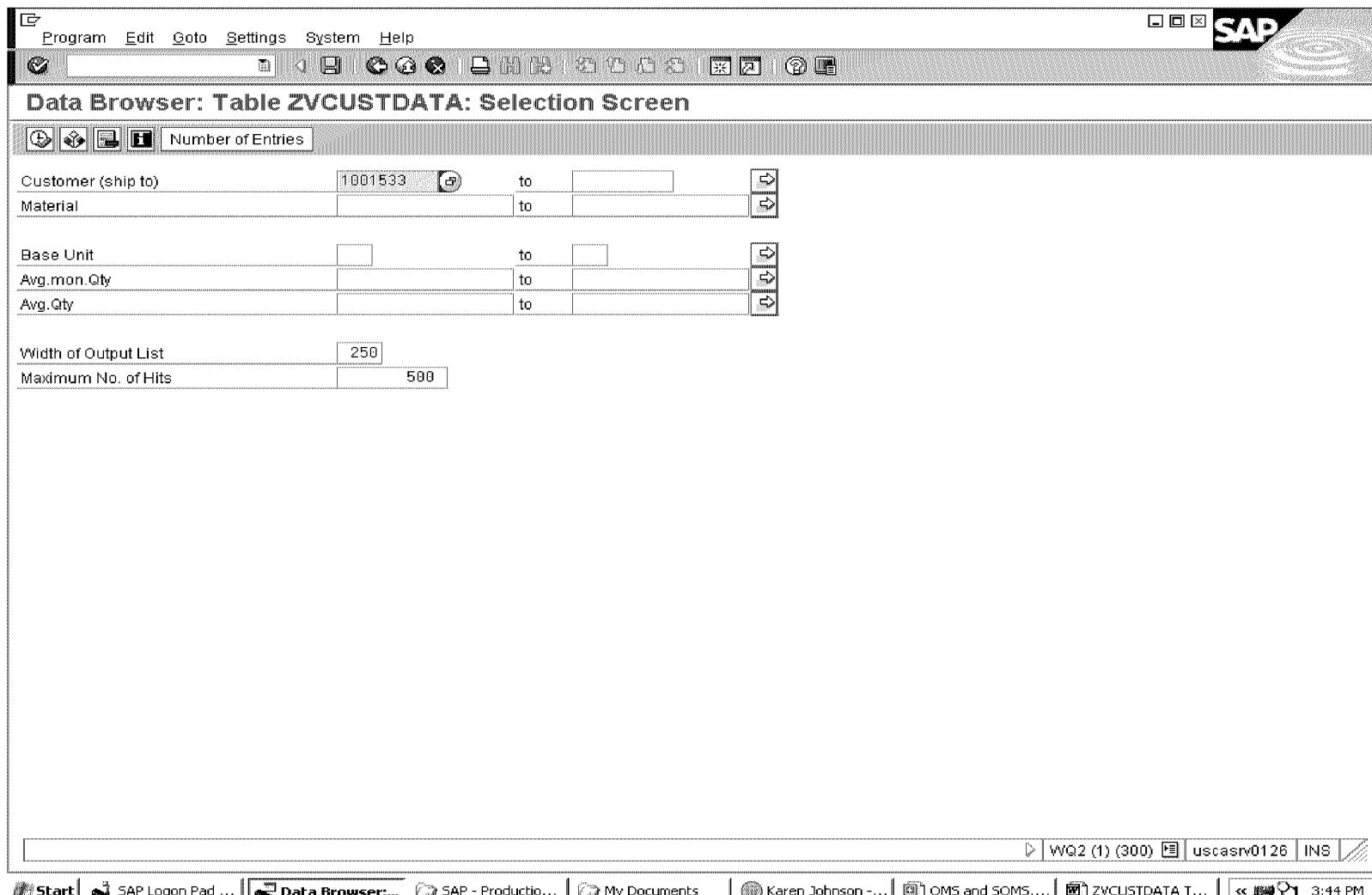
Start SAP Logon Pad 620 Data Browser: Initial... Data Browser: Ta... My Documents EDD0011 Microsoft PowerPoint... Q 3:18 PM

Once the order has been saved the Orders field is populated and when it has been invoiced the Billed qty field is populated. The Table contains data by Month, Class of Trade, Material, Number of Orders and Billed qty. This table is used to calculate the values displayed in the ZVTRADEDATA table for Average month quantity and Average order quantity.

Transaction SE16 ZVCUSTDATA

Based on Ship-to Customer





Example: Selection criteria Customer (ship to)

The screenshot shows the SAP Data Browser interface with the title "Data Browser: Table ZVCUSTDATA Select Entries 526". The table has 6 columns: Client, Customer (ship-to), Material, Base Unit, Avg. mon. Qty., and Avg. Qty. The "Avg. mon. Qty." and "Avg. Qty." columns are highlighted with ovals. The data consists of approximately 30 rows, each representing a unique combination of Client, Customer, and Material.

Client	Customer (ship-to)	Material	Base Unit	Avg. mon. Qty.	Avg. Qty.
300	0001001533	0000000000078010705	BTL	36.000	36.000
300	0001001533	0000000000078024305	BTL	39.000	19.500
300	0001001533	0000000000536000486	BTL	188.000	51.273
300	0001001533	0000000000536009185	BTL	17.500	17.500
300	0001001533	0000000000536011183	BTL	9.000	9.000
300	0001001533	0000000000536012285	BTL	32.222	22.308
300	0001001533	0000000000536012297	BTL	181.714	106.000
300	0001001533	0000000000536012372	BTL	85.333	54.857
300	0001001533	0000000000536016085	BTL	12.000	12.000
300	0001001533	0000000000536016097	BTL	8.333	8.333
300	0001001533	0000000000536035501	BTL	93.000	93.000
300	0001001533	0000000000536037097	BTL	12.500	12.500
300	0001001533	0000000000536041085	BTL	51.000	29.143
300	0001001533	0000000000536041772	BTL	8.500	8.500
300	0001001533	0000000000536060085		17.167	20.600
300	0001001533	0000000000536065085	BTL	12.000	12.000
300	0001001533	0000000000536071080	BTL	18.000	12.000
300	0001001533	0000000000536077085	BTL	32.571	22.800
300	0001001533	0000000000536077097	BTL	37.091	37.091
300	0001001533	0000000000536081095	TUB	8.500	11.333
300	0001001533	0000000000536081595	TUB	12.000	12.000
300	0001001533	0000000000536082585	BTL	34.714	24.300
300	0001001533	0000000000536088085	BTL	5.000	2.500
300	0001001533	0000000000536090197	BTL	24.000	20.000
300	0001001533	0000000000536093586	BTL	1,335.000	239.104
300	0001001533	0000000000536093686	BTL	1,668.778	268.196
300	0001001533	0000000000536097097	BTL	15.000	15.000
300	0001001533	0000000000536110095	TUB	46.286	32.400
300	0001001533	0000000000536125512	BOX	14.000	14.000
300	0001001533	0000000000536126012	BOX	9.600	9.600
300	0001001533	0000000000536132012	BOX	24.000	24.000

WQ2 (1) (300) uscasrv0126 INS

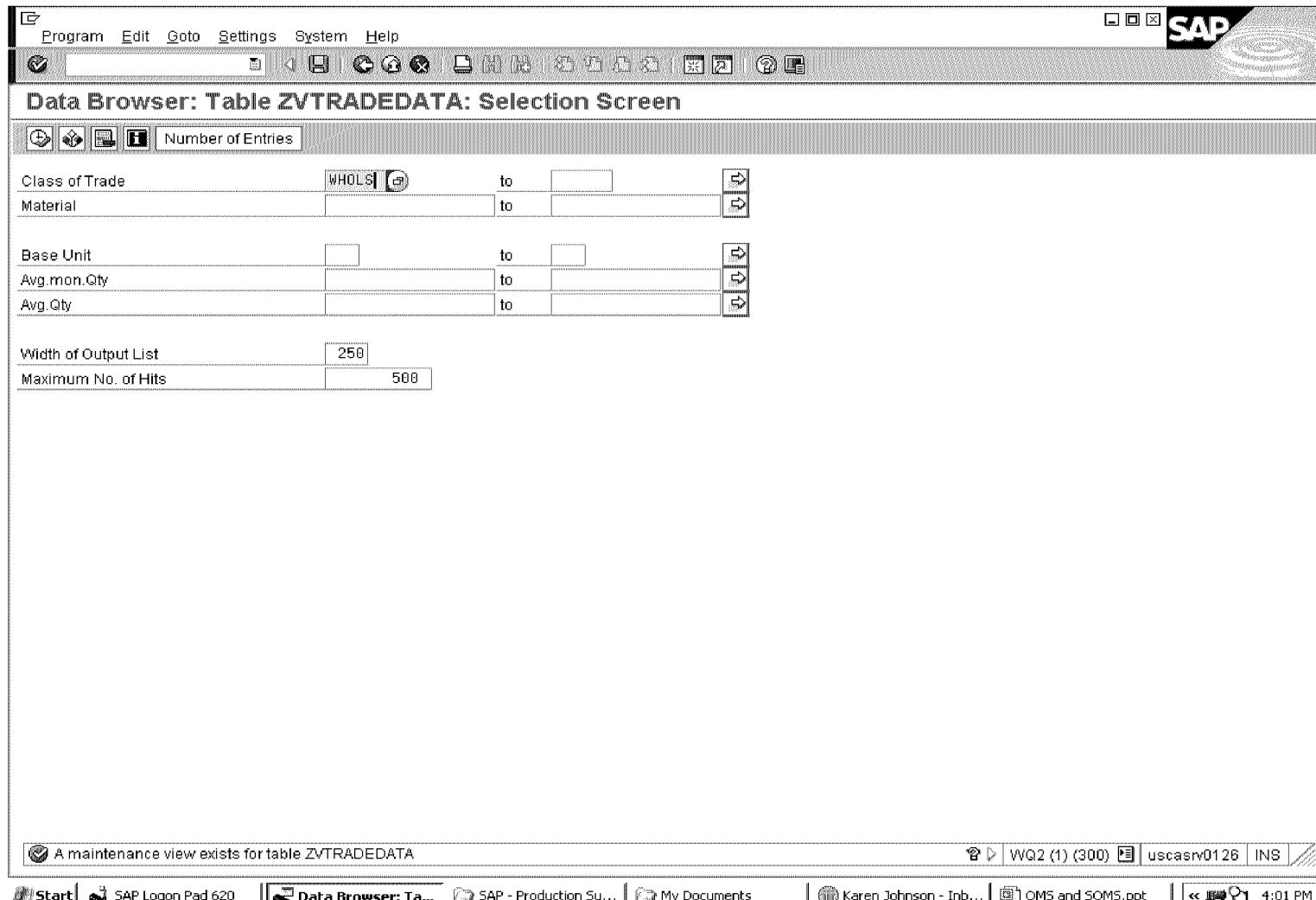
This table captures the average monthly and average order quantity for ship-to **customer** and **material** for a rolling 12 months. OMS only uses the Avg. mon. Qty. SOMS uses both.

Note: A batch job is scheduled to run the first of the month to update tables ZVCUSTDATA and ZVTRADEDATA. Batch job: ZNH_SD_M_TABMAINTENANCE. The data stored in the S911 and S910 tables is used to calculate the values on the ZVCUSTDATA and ZVTRADEDATA tables for a rolling 12 months. 13



Transaction SE16 ZVTRADEDATA Table Based on Class of Trade





Example: Selection Criteria Class of Trade

Data Browser: Table ZVTRADEDATA Select Entries 500

Table: ZVTRADEDATA
Displayed Fields: 6 of 6 Fixed Columns: 3 List Width 0250

Client	Class of Trade	Material	Base Unit	Avg Month Qty	Avg Order Qty
300	WHOLS	000000000078008405		0.000	0.000
300	WHOLS	000000000078010308	BTL	185.000	16.818
300	WHOLS	000000000078010705	BTL	3,272.800	31.051
300	WHOLS	000000000078024305	BTL	2,417.400	23.470
300	WHOLS	000000000536000486	BTL	1,213.833	107.103
300	WHOLS	000000000536001583	BTL	1,037.667	56.858
300	WHOLS	000000000536002583	BTL	2,592.917	85.953
300	WHOLS	000000000536009185	BTL	3,582.500	55.399
300	WHOLS	000000000536011183	BTL	2,131.083	43.715
300	WHOLS	000000000536012285	BTL	2,955.583	56.566
300	WHOLS	000000000536012297	BTL	9,060.333	206.700
300	WHOLS	000000000536012372	BTL	6,269.583	151.683
300	WHOLS	000000000536016085	BTL	1,530.917	28.885
300	WHOLS	000000000536016097	BTL	2,350.250	58.151
300	WHOLS	000000000536035501	BTL	324.200	40.025
300	WHOLS	000000000536035510	BTL	45.182	10.574
300	WHOLS	000000000535037097	BTL	3,624.167	90.416
300	WHOLS	000000000536041059	BTL	894.833	49.944
300	WHOLS	000000000536041085	BTL	1,488.167	33.505
300	WHOLS	000000000536041772	BTL	81.500	14.052
300	WHOLS	000000000536041891	TUB	79.833	17.107
300	WHOLS	000000000536051085	BTL	480.750	30.047
300	WHOLS	000000000536051097	BOX	1,548.917	79.094
300	WHOLS	000000000536059085	BTL	1,938.750	45.087
300	WHOLS	000000000536060085	BTL	2,795.417	80.637
300	WHOLS	000000000536065085	BTL	7,596.917	72.294
300	WHOLS	000000000536071080	BTL	2,403.000	84.070
300	WHOLS	000000000536077085	BTL	3,698.250	101.091
300	WHOLS	000000000536077097	BTL	6,308.417	103.985
300	WHOLS	000000000536081095	TUB	2,230.833	91.365
300	WHOLS	0000000005360811595	TUB	1,659.333	59.976

Selection restricted to 500 hits

WQ2 (1) (300) uscasrv0126 INS

Start SAP Logon Pad 620 Data Browser: Ta... SAP - Production Su... My Documents Karen Johnson - Inb... OMS and SOMS.ppt 4:01 PM

ZVTRADEDATA table is used for SOMS only. This table captures the Average month quantity and Average order quantity for **class of trade** and **material** for rolling 12 months.

Note: A batch job is scheduled to run the first of the month to update tables ZVCUSTDATA and ZVTRADEDATA. Batch job: ZNH_SD_M_TABMAINTENANCE. The data stored in the S911 and S910 tables is used to calculate the values on the ZVCUSTDATA and ZVTRADEDATA tables for a rolling 12 months.

Suspicious Order Management (SOMS)

SOMS Logic Program ZVE_SUSP_ORDER_CHECK

Program ZVE_SUSP_ORDER_CHECK

User exit in order processing is executed when a material and order quantity is entered and “Enter” is pressed. Transactions VA01 and VA02.

OMS logic occurs before the SOMS logic.

Order types that include SOMS logic: OR, FD, TAV, ZC2, ZEDI, ZDO, ZSD and ZC2.

Only checks for controlled substances (Schedule 2, 2N, 3, 3N, 4 and 5)

Bypasses SOMS logic if an item is a literature material (item category ‘ZKLL’).

Bypasses SOMS delivery block if an order is already blocked by logic other than SOMS.

Example: Order Type ZC2 automatically blocks for ‘ZC2 QA Block’ delivery block, once that is removed if there is an item on the order that exceeds one of the SOMS benchmarks, it will block for SOMS.

Suspicious Order Management (SOMS) Logic

Logic retrieves benchmark data for:

- customer / material from table ZVCUSTDATA
- class of trade / material from table ZVTRADEDATA
- month-to-date billed quantity for customer/material from table S911
- class of trade multiplier from ZVMUL is based on class of trade of the sold-to customer

Sequence for retrieving benchmark data:

1. Customer Average per Month
2. Customer Average per Order
3. Class of Trade Average per Month
4. Class of Trade Average per Order

Delivery blocks values for SOMS are:

- Suspect CUS Av/mth (12)
- Suspect CUS Av/ord (13)
- Suspect COT Av/mth(10)
- Suspect COT Av/ord(11)

Suspicious Order Management (SOMS) Documentation

Custom FS EDD0011 Suspicious Order Check (SOMS)

Custom FS EDD0024 Table Maintenance for SOMS and OMS

Custom FS EDD0052 Additional Data on Sales Order

FORM0053 SOMS Investigation Form

RPT0077 Purchasing Benchmark for the Suspicious Order Monitoring System

Technical Specification located in G:\Global\IT Doc Control\Approved Documents\SAP APPROVED DOCUMENTS\Custom Objects

Example: 1A

The screenshot shows the SAP Create Standard Order: Overview screen. The top navigation bar includes Sales document, Edit, Goto, Extras, Environment, System, Help, and the SAP logo. The main title is "Create Standard Order: Overview". Below the title, there are tabs for Sales, Item overview, Item detail, Ordering party, Procurement, Shipping, and Reason for rejection. The Sales tab is selected.

Key fields visible include:

- Standard Order: 1075478
- Netvalue: 8,701.06 USD
- Sold-to party: 1075478 D&K WHOLESALE DRUG / 8000 MARYLAND AVE / ST LOUIS...
- Ship-to party: 1000667 WALSH HEARTLAND LLC / #1 WALSH DR / PARAGOULD AR 7...
- PO Number: Testing SOMS #1
- PO date: 07/14/2006
- Req. deliv.date: 07/14/2006
- Deliver.Plant: 12.640 LB
- Total Weight: 12.640 LB
- Delivery block: Suspect (Cus Avr/mth) Volume: 30.099 DM3
- Billing block: 07/14/2006
- Payment card: Exp.date:
- Payment terms: Z005 2 % 60 NET 61
- Incoterms: CIF
- Destination: Watson, Watson, Watson
- Sales area: 1000 / 10 / 10

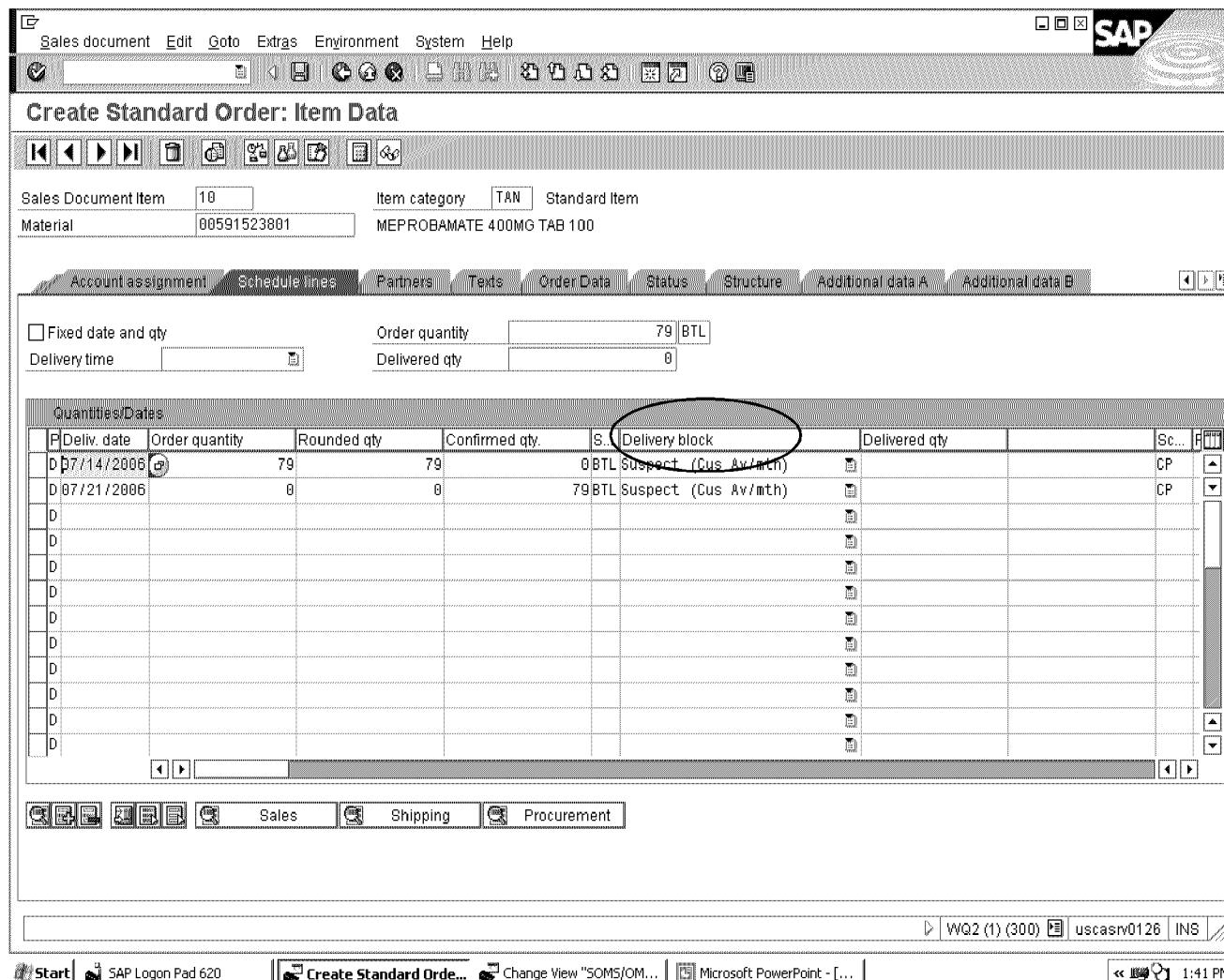
The "Delivery block" field is highlighted with a red oval, indicating a restriction. The "All items" table below shows one item entry:

Item	Material	Order quantity	SU	S	Description	Customer Material Numbr	ItCa	DG...	HcLvt	CFirst d...
	10 00591523801	79 BTL	<input checked="" type="checkbox"/>		MEPROBAMATE 400MG TAB 100	TAN				D 07/14
			<input type="checkbox"/>							D 07/14
			<input type="checkbox"/>							D 07/14
			<input type="checkbox"/>							D 07/14
			<input type="checkbox"/>							D 07/14
			<input type="checkbox"/>							D 07/14
			<input type="checkbox"/>							D 07/14
			<input type="checkbox"/>							D 07/14
			<input type="checkbox"/>							D 07/14

At the bottom, the status bar shows "WQ2 (1) (300) uscasrv0126 INS" and the time "1:41 PM".

Sales Order is blocked for SOMS Customer Average per Month.

Example: 1A



Material line item has a delivery block for Suspect Customer Average per Month. SOMS blocks for delivery at the header and item level. If stock is available the line item will confirm order qty.

Example: 1A

Sales document Edit Goto Extras Environment System Help

Create Standard Order: Header Data

Standard Order Purchase order no. Testing S0MS #1

Sold-to party 1075478 D&K WHOLESALE DRUG / 8000 MARYLAND AVE / ST LOU...

Sales Shipping Billing Document Payment card Accounting Conditions Account assignment Partners Texts Order Data

Order Type	OR	Standard Order	Document date	07/14/2006
Sales area data	1000	/ 10 / 10	Watson Sales, Watson, Watson	
Sales office			Created by	KJOHNSON
Sales group			Created on	07/14/2006
Version			Guarantee	
Order reason				
Delivery time				

Pricing and statistics

Doc. currency	USD	/ 1.00000	Pricing date	07/14/2006
Pric. procedure	ZVDWAT	Watson Direct P	Contract ID	
Price List		Usage		
Price group		Class of Trade	WHOLS	Wholesaler

Start SAP Logon Pad 620 Create Standard Order SAP Easy Access Microsoft PowerPoint - [...] WQ2 (1) (300) uscasnv0126 INS 1:46 PM

Customer's Class of Trade is WHOLS (Wholesaler).

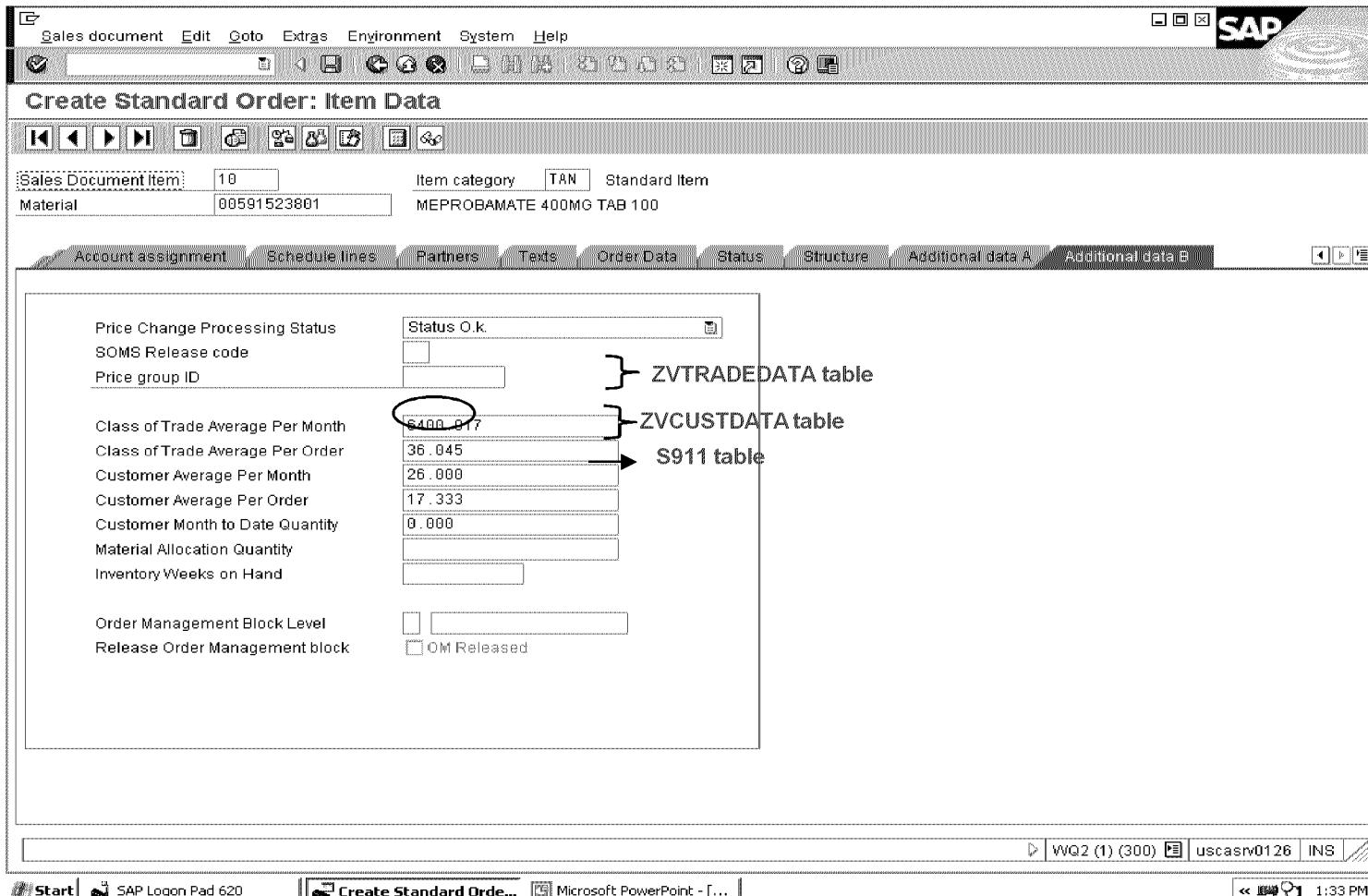
The screenshot shows an SAP application window titled "Change View 'SOMS/OMS table - Multiplier Data': Overview". The main area displays a table titled "SOMS/OMS table - Multiplier Data" with the following data:

Class.	No.	SOMS Mult.	OMS Mult.
MANF	999	999.000	999.000
MDCD	999	999.000	999.000
MDDDC	999	999.000	999.000
NURSH	999	999.000	999.000
NWCH	999	999.000	999.000
OGA	999	999.000	999.000
OTHER	999	999.000	999.000
OUTP	999	999.000	999.000
PBM	999	999.000	999.000
PHMCY	999	999.000	999.000
PHS	999	999.000	999.000
PHYSN	999	999.000	999.000
PLDIS	999	999.000	999.000
RBG	999	999.000	999.000
RPKG	999	999.000	999.000
RXPHY	999	999.000	999.000
SLREP	999	999.000	999.000
SVH	999	999.000	999.000
VA	999	999.000	999.000
VET	999	999.000	999.000
WHOLS	36	3.000	1.500

At the bottom of the SAP interface, there are several status indicators and system messages. The message bar includes: "Position..." (highlighted), "Entry 16 of 36", "WQ2 (2) (300)", "uscasny0128", "INS", "Microsoft PowerPoint - [...]", "Create Standard Order: ...", "SAP Logon Pad 620", "Start", and "1:42 PM".

SOMS Multiplier for WHOLS Class of Trade is 3.000

Example 1A



Customer Average Per Month is 26.000. Class of Trade is WHOLS so the (ZVMUL table) SOMS Multiplier is 3.000.

Calculation: Cust Av/Mth x SOMS Multiplier – Cust Month to Date Quantity (S911) = Benchmark.

$26.000 \times 3.000 - 0 = 78$ Anything greater than 78 will block for SOMS.

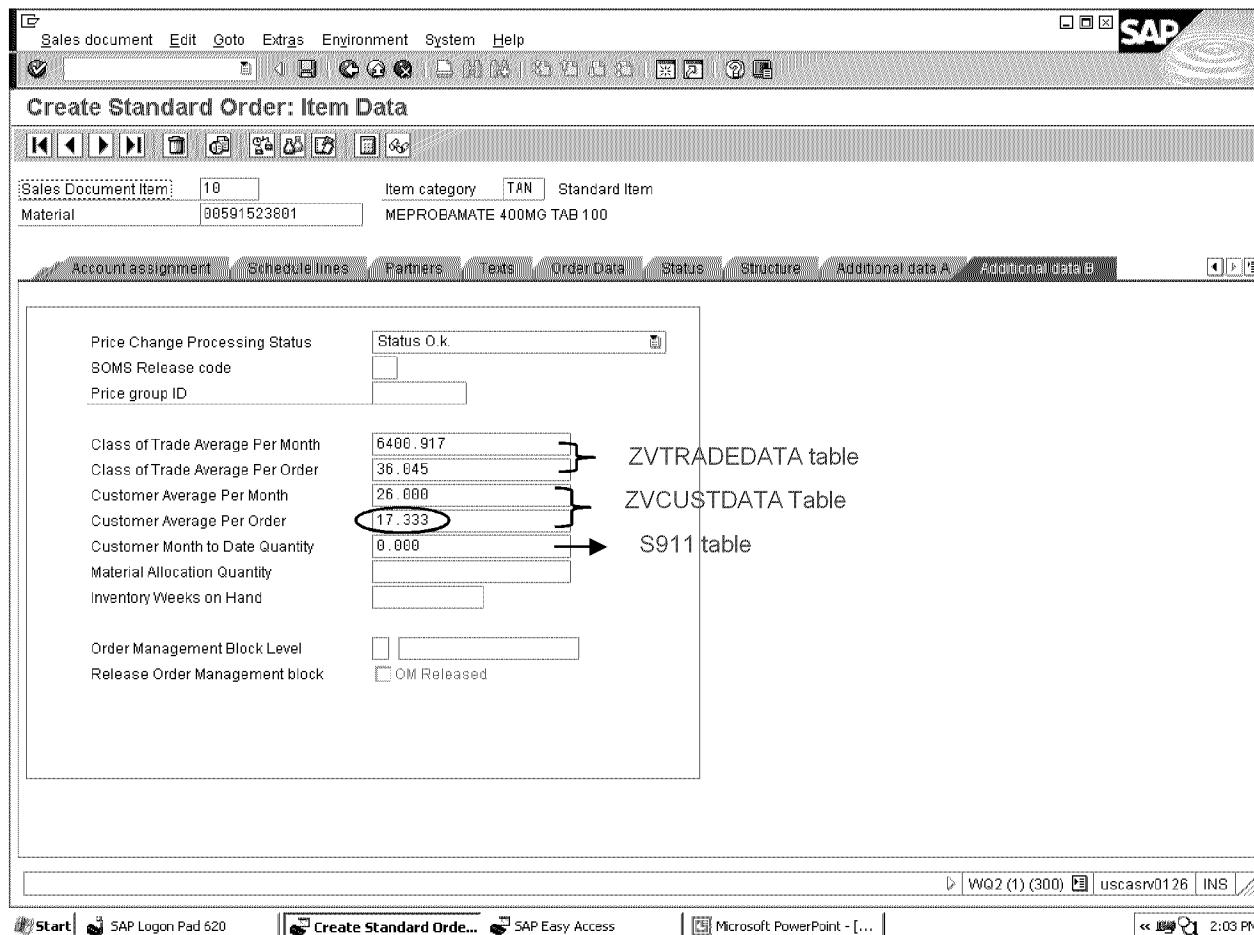
Example 1B

The screenshot shows the SAP Create Standard Order: Overview screen. At the top, there are fields for Standard Order number (1075478), Net value (8,590.92 USD), Sold-to party (D&K WHOLESALE DRUG / 8000 MARYLAND AVE / ST LOUIS...), and Ship-to party (WALSH HEARTLAND LLC / #1 WALSH DR / PARAGOULD AR 7...). The PO Number is Testing SOMS #1, and the PO date is 07/14/2006. Below the header, tabs include Sales, Item overview, Item detail, Ordering party, Procurement, Shipping, and Reason for rejection. The Sales tab is selected. A circled area highlights the 'Suspect (Cus Aword)' field under Delivery block. The item detail table shows one item: 1000591523801, Description: MEPROBAMATE 400MG TAB 100, Order quantity: 78, and Customer Material Num: TAN. The status column for this item shows four entries: D 07/14, D 07/14, D 07/14, and D 07/14, all with dropdown arrows. At the bottom, the status bar shows WQ2 (1) (300), uscasrv0126, INS, and the time 1:54 PM.

Item	Material	Order quantity	SU	S	Description	Customer Material Num	ItCa	DG...	HgLvlt	First d...
1000591523801		78	BTL	<input checked="" type="checkbox"/>	MEPROBAMATE 400MG TAB 100	TAN	D 07/14			
				<input type="checkbox"/>			D 07/14			
				<input type="checkbox"/>			D 07/14			
				<input type="checkbox"/>			D 07/14			
				<input type="checkbox"/>			D 07/14			

Order quantity is changed to 78 and the order is now blocked for Suspect Customer Average per Order.

Example 1B



Customer Average Per Order is 17.333. Class of Trade is WHOLS so the (ZVMUL table) SOMS Multiplier is 3.000.
 Calculation: Customer Average Per Order x SOMS Multiplier = Benchmark

$17.333 \times 3.000 = 51.999$ Anything over 52 will block for SOMS.

Example 2

The screenshot shows the SAP Create Standard Order: Overview interface. At the top, there are fields for Standard Order number (empty), Net value (47,712.72 USD), Sold-to party (1201458, N C MUTUAL WHOLESALE DRUG / PO Box 411 / DURHAM NC), Ship-to party (1201458, N C MUTUAL WHOLESALE DRUG / PO Box 411 / DURHAM NC), and PO Number (SOMS Test#2). Below these are tabs for Sales, Item overview, Item detail, Ordering party, Procurement, Shipping, and Reason for rejection. The Sales tab is selected. In the main area, under Delivery block, the value 'Suspect (COT Award)' is highlighted with a red oval. Other delivery details include Total Weight (55.800 LB) and Volume (138.291 DM3). Under Billing block, Pricing date is set to 07/14/2006. Payment terms are 2005, 2 % 60 NET 61. The item overview table shows one item: NORCO 10/325MG TAB 500, ordered quantity 93 BTL, and customer material number TAN. The status column for all rows shows 'D 07/14'. The bottom status bar shows 'WQ2 (1) (300)' and 'uscasrv0126 INS'.

Item	Material	Order quantity	SU	Description	Customer Material Numbr	ItCa	DG...	HgLvlt	First d...
	1052544053905	93 BTL	<input checked="" type="checkbox"/>	NORCO 10/325MG TAB 500	TAN				D 07/14
			<input type="checkbox"/>						D 07/14
			<input type="checkbox"/>						D 07/14
			<input type="checkbox"/>						D 07/14
			<input type="checkbox"/>						D 07/14
			<input type="checkbox"/>						D 07/14

Sales Order is blocked for Suspect Class of Trade
Average Per Order.

Example 2

Sales document Edit Goto Extras Environment System Help

Create Standard Order: Header Data

Standard Order [] Purchase order no. SOMS Test#2

Sold-to party 1201458 N C MUTUAL WHOLESALE DRUG / PO Box 411 / DURHAM ...

Sales Shipping Billing Document Payment Cards Accounting Conditions Account assignment Partners Texts Order Data

Order Type	OR	Standard Order	Document date	07/18/2006
Sales area data	1000	/ 10	/ 10	Watson Sales, Watson, Watson
Sales office	[]		Created by	KJOHNSON
Sales group	[]		Created on	07/18/2006
Version	[]		Guarantee	[]
Order reason	[]			
Delivery time	[]			

Pricing and statistics

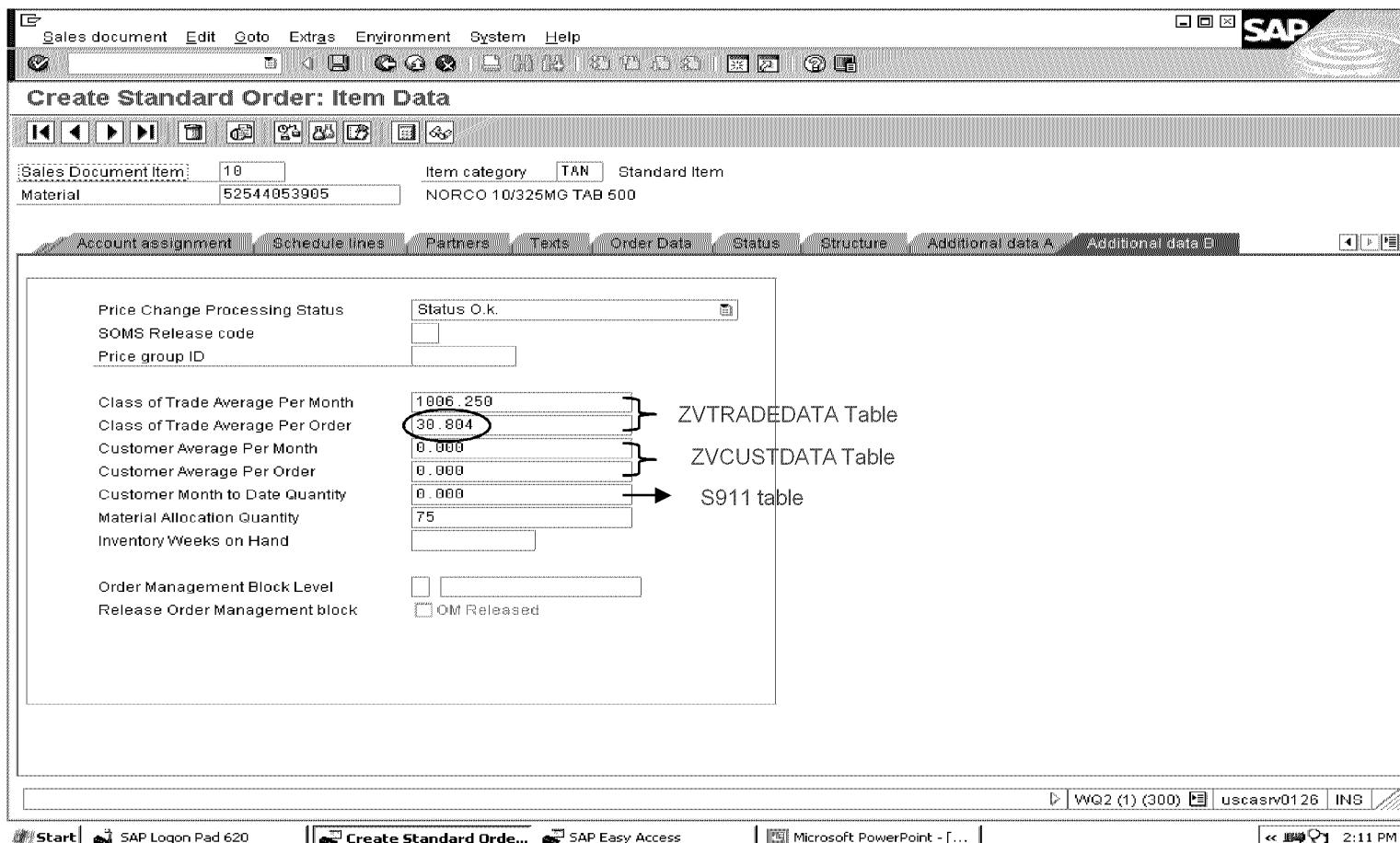
Doc. currency	USD	/ 1.00000	Pricing date	07/18/2006
Pric. procedure	ZWDWAT	Watson Direct P	Contract ID	WAC
Price List	[]	Usage	[]	[]
Price group	[]	Class of Trade	WHOLS	Wholesaler

template.doc 3103705.doc

VA01 uscasrv0126 INS

Customer's Class of Trade is Whols (Wholesaler).

Example 2



Class of Trade Average Per Order is 30.804. Customer's Class of Trade is Wholesaler so the SOMS Multiplier is 3.000 (ZVMUL table).

Calculation: Class of Trade Average Per Order x SOMS Multiplier = Benchmark.

$30.804 \times 3.000 = 92.412$ Anything over 92 will block for SOMS.

Example 3

The screenshot shows the SAP Create Standard Order: Overview screen. At the top, there are menu options: Sales document, Edit, Goto, Extras, Environment, System, Help. The SAP logo is in the top right corner. Below the menu is a toolbar with icons for various functions.

The main title is "Create Standard Order: Overview". Below it, there's a sub-header "Orders".

Key fields shown include:

- Standard Order: Net value 1,548,867.76 USD
- Sold-to party: 1201458 N C MUTUAL WHOLESALE DRUG / PO Box 411 / DURHAM NC...
- Ship-to party: 1201458 N C MUTUAL WHOLESALE DRUG / PO Box 411 / DURHAM NC...
- PO Number: SOMS Test 3 PO date 07/17/2006

Below these are tabs: Sales, Item overview, Item detail, Ordering party, Procurement, Shipping, Reason for rejection. The Sales tab is selected.

Delivery details include:

- Req. deliv.date: 07/17/2006
- Deliver.Plant: [empty]
- Complete delv.
- Total Weight: 1,811.400 LB
- Delivery block: Suspect (COT Avlmth) [circled]
- Volume: 4,489.253 DM3
- Billing block: [empty]
- Pricing date: 07/17/2006
- Payment card: [empty]
- Exp. date: [empty]
- Payment terms: Z005 2 % 60 NET 61
- Incoterms: CIF
- Destination: [empty]
- Order reason: [empty]
- Sales area: 1000 / 10 / 10 Watson Sales, Watson, Watson

The "All items" section displays a table of order items:

Item	Material	Order quantity	SU	S	Description	Customer Material Numbr	ItCa	DG..	HgLvlt	First d
1052544053905		3,019.8TL		<input checked="" type="checkbox"/>	NORCO 10/325MG TAB 500	TAN				07/17
				<input checked="" type="checkbox"/>						07/17
				<input checked="" type="checkbox"/>						07/17
				<input checked="" type="checkbox"/>						07/17
				<input checked="" type="checkbox"/>						07/17
				<input checked="" type="checkbox"/>						07/17

At the bottom, there are navigation icons and status bars:

- Start, SAP Logon Pad 620, Create Standard ..., Data Browser: Table..., My Documents, EDD, Microsoft PowerPoint..., 4:29 PM
- VAD1, uscasinv0126, INS

Sales Order is blocked for Suspect Class of Trade Average per Month.

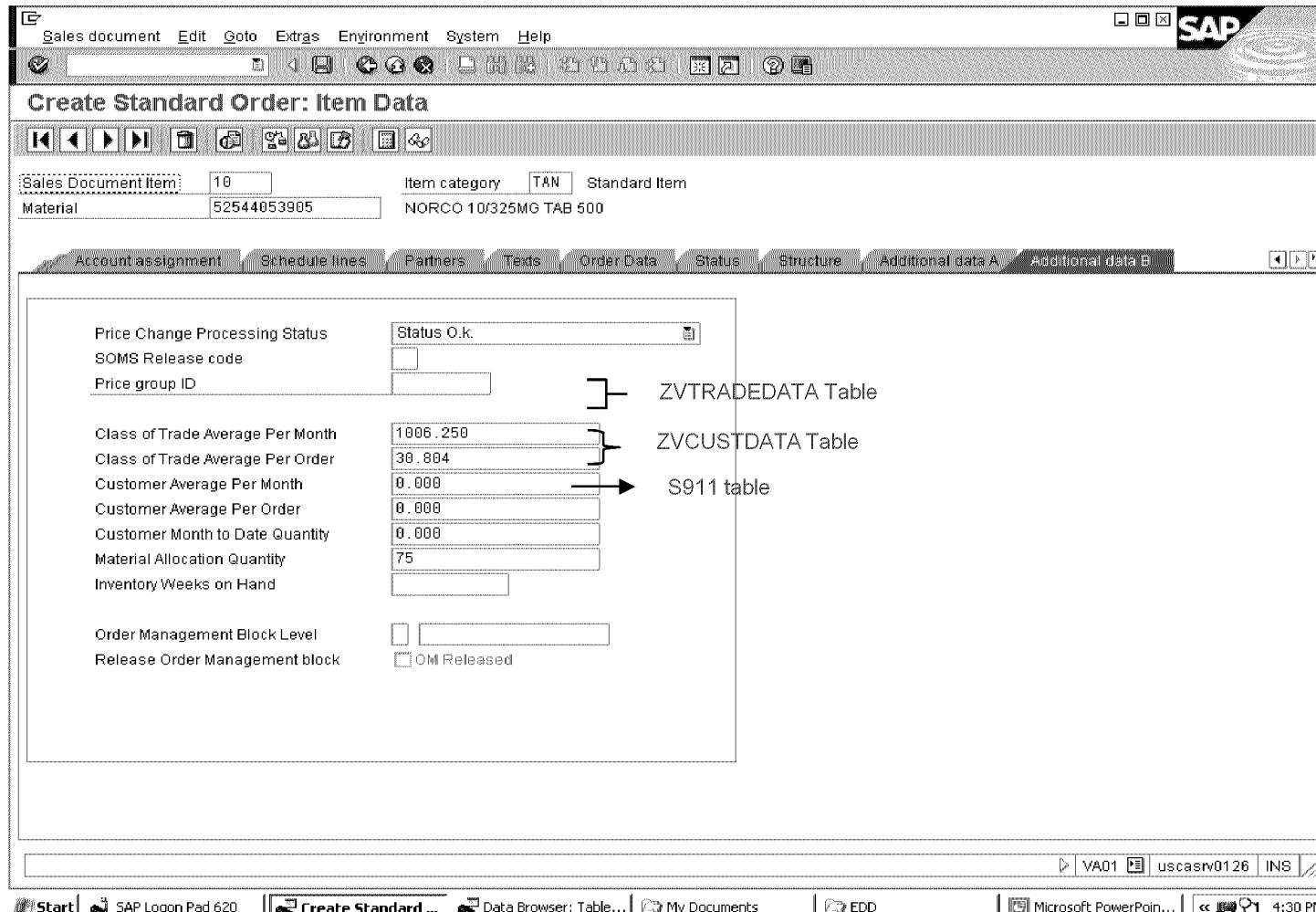
Example 3

The screenshot shows the SAP ERP interface for creating a standard order. The title bar reads "Create Standard Order: Header Data". The main area contains various input fields and tabs for Sales, Shipping, Billing Document, Payment cards, Accounting, Conditions, Account assignment, Partners, Texts, and Order Data. In the "Conditions" section, under "Pricing and statistics", the "Class of Trade" field is highlighted with a red oval. The value "WHOLS" is entered in this field.

Field	Value
Order Type	OR
Sales area data	1000 / 10 / 10
Sales office	
Sales group	
Version	
Order reason	
Delivery time	
Doc. currency	USD / 1.00000
Pric. procedure	ZWDWAT
Price List	
Price group	
Pricing date	07/18/2006
Contract ID	WAC
Usage	
Class of Trade	WHOLS

Customer's Class of Trade is Whols (Wholesaler).

Example 3

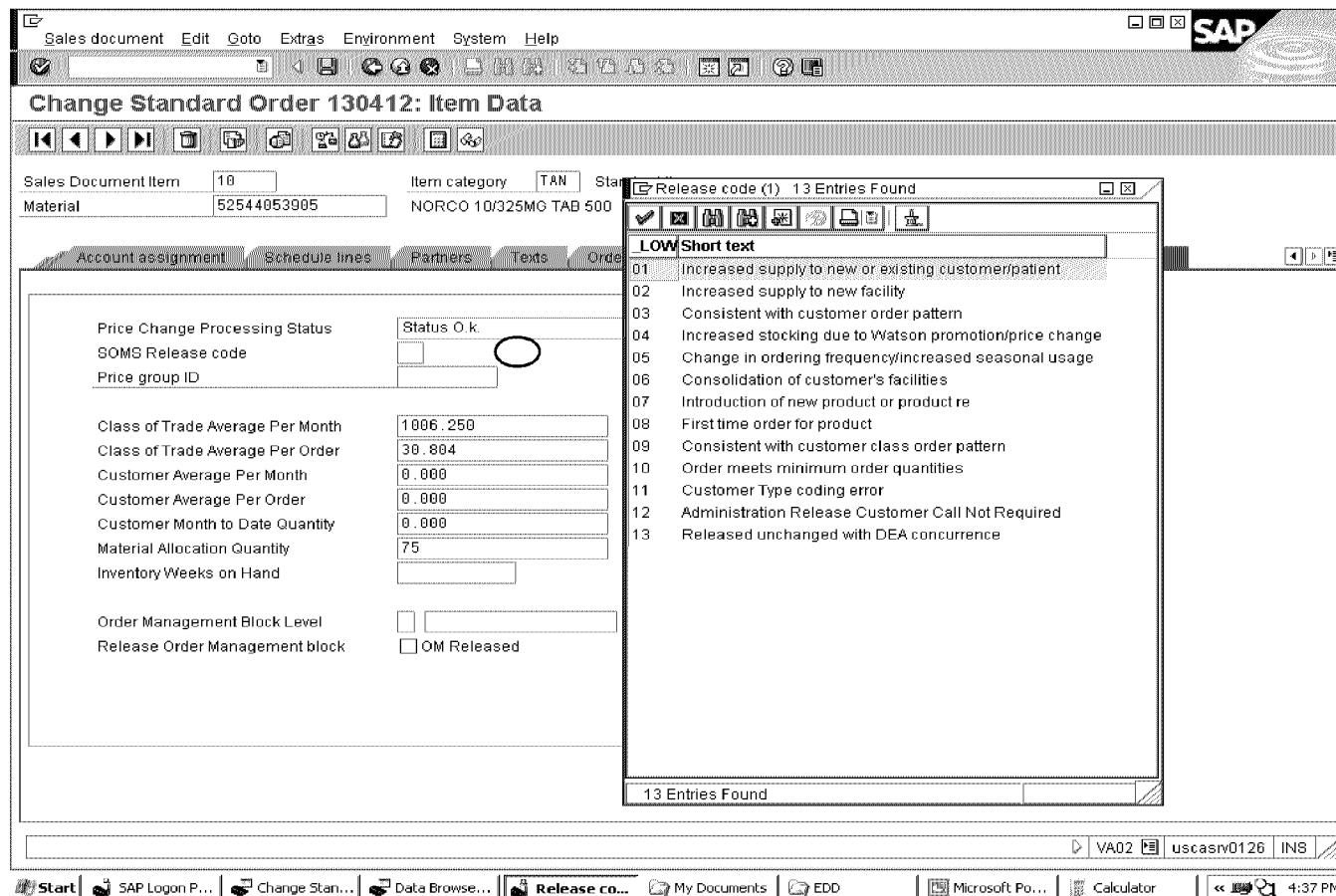


Class of Trade Average Per Month is 1006.250 Customer's Class of Trade is Wholesaler so the (ZVMUL table) SOMS Multiplier is 3.000.

Calculation: COT Av/Mth x SOMS Multiplier = Benchmark

$1006.250 \times 3.000 = 3018.75$ (Benchmark) Anything higher than 3018 will block for SOMS.

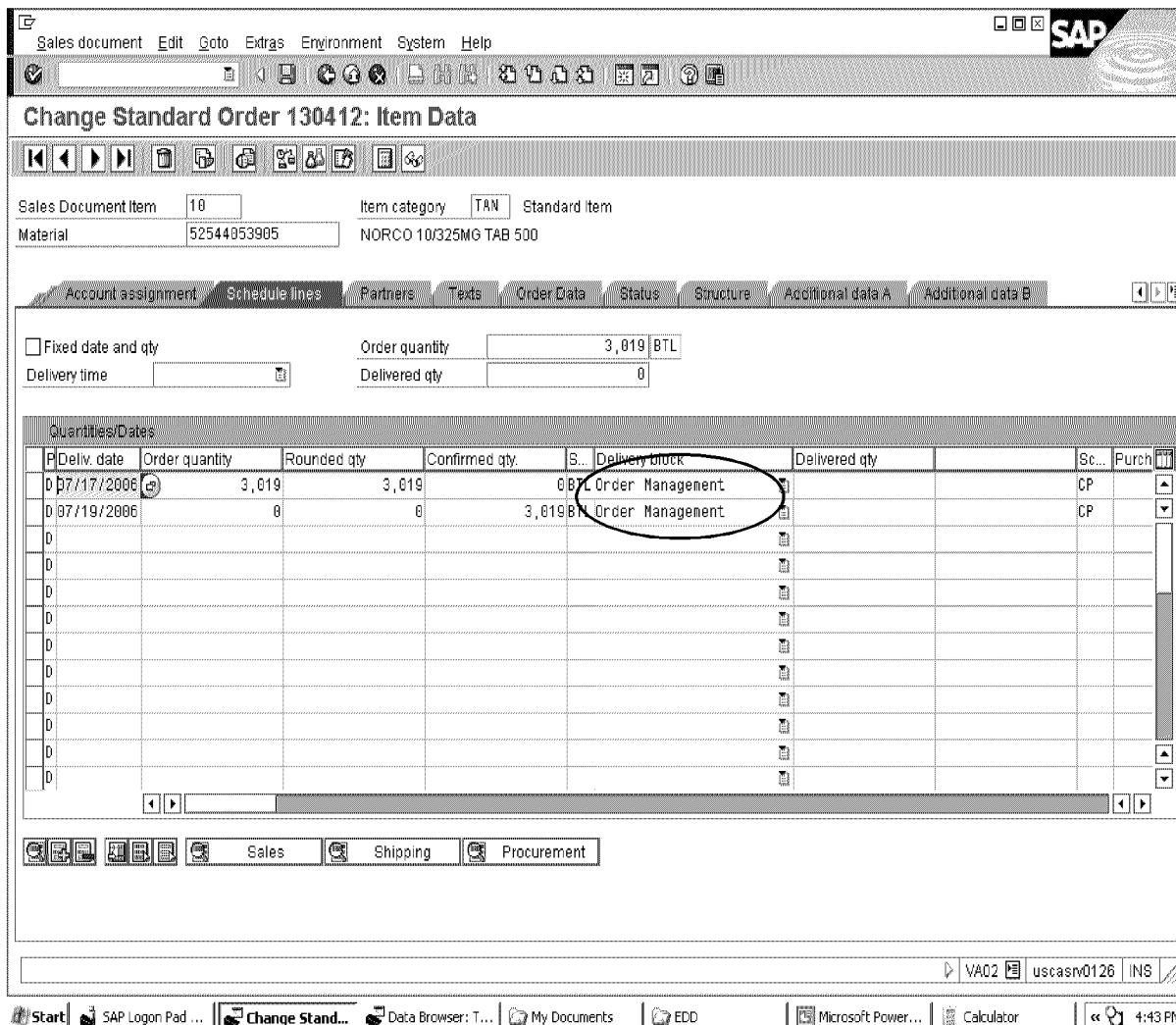
Releasing a SOMS block



To release a SOMS block one of the following Reason codes is entered in the SOMS Release code field using transaction VA02.

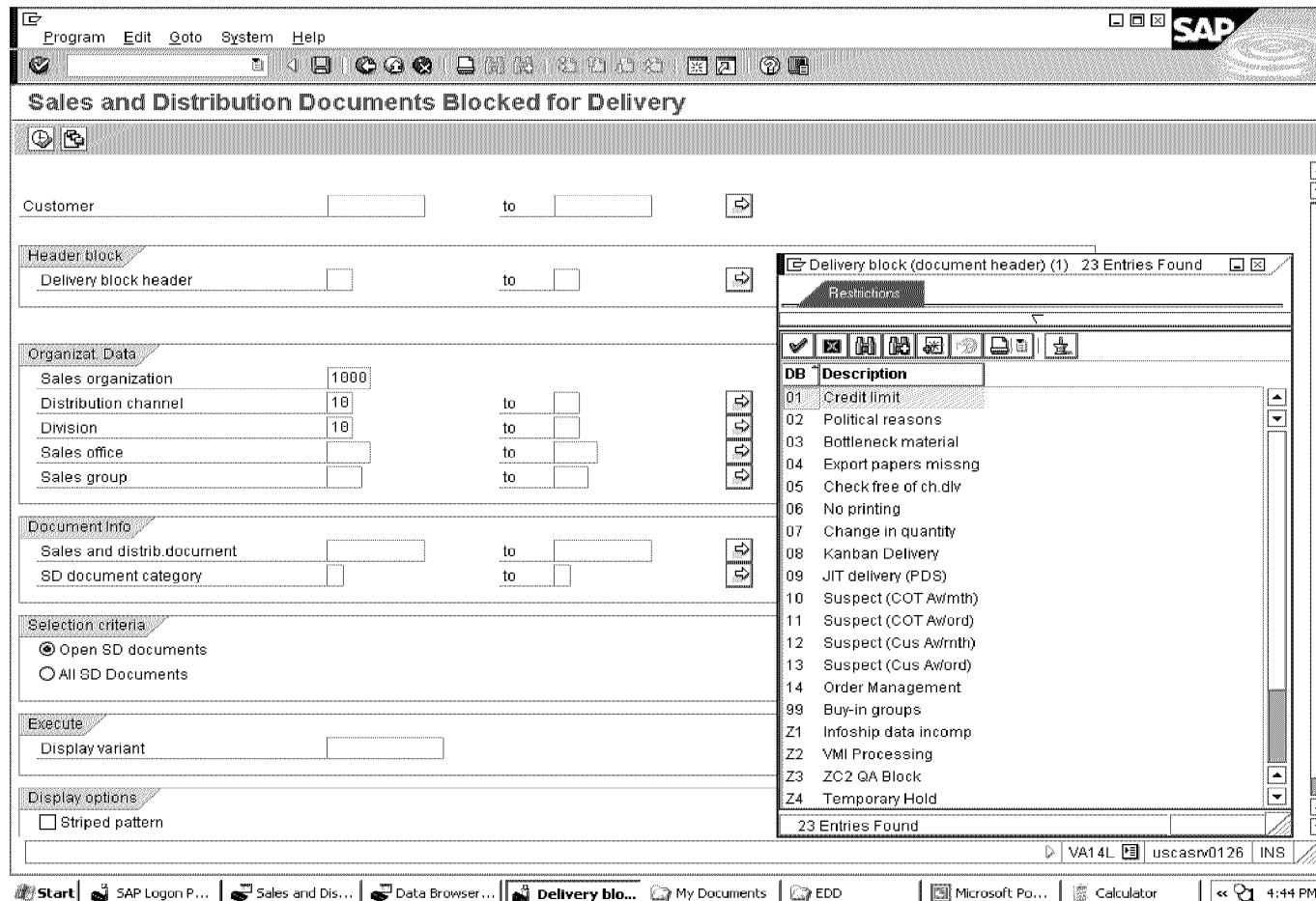
The screenshot shows the SAP ERP interface for changing a standard order. The title bar reads "Sales document Edit Goto Extras Environment System Help" and the SAP logo is visible. The main title is "Change Standard Order 130412: Overview". Below the title is a toolbar with icons for various functions like Sales, Item overview, Item detail, Ordering party, Procurement, Shipping, and Reason for rejection. The header contains fields for Standard Order (130412), Net value (1,548,867.76 USD), Sold-to party (1201458 NC MUTUAL WHOLESALE DRUG / PO Box 411 / DURHAM NC...), Ship-to party (1201458 NC MUTUAL WHOLESALE DRUG / PO Box 411 / DURHAM NC...), PO Number (SOMS Test 3), and PO date (07/17/2006). A tab bar below the header includes Sales, Item overview, Item detail, Ordering party, Procurement, Shipping, and Reason for rejection. The main content area displays various order details: Req. deliv.date (07/17/2006), Deliver.Plant (empty), Complete dlv. (unchecked), Total Weight (1,811.400 LB), Delivery block (set to "Order Management" and circled in red), Volume (4,489.253 DM3), Billing block (empty), Pricing date (07/17/2006), Payment card (empty), Exp.date (empty), Payment terms (Z005 2 % 60 NET 61), Incoterms (CIF), Destination (empty), Order reason (empty), and Sales area (1000 / 10 / 10 Watson Sales, Watson, Watson). Below this is a table titled "All items" showing one item line: Item (1052544053905), Material (3,019 BTL), Order quantity (3,019 BTL), SU (checkbox checked), Description (NORCO 10/325MG TAB 500), Customer Material Numb (TAN), ItCa (empty), DG... (empty), HgLvlt (empty), First d... (empty), and several date fields (D 07/17, D 07/17, D 07/17, D 07/17, D 07/17). At the bottom, there are navigation icons and a status bar showing VA02, uscasrv0126, INS, Start, SAP Logon Pad..., Change Stand..., Data Browser: T..., My Documents, EDD, Microsoft Power..., Calculator, and the time 4:40 PM.

After the SOMS Release code has been entered the Delivery block field is set to 'Order Management' at the header and schedule line. Note: Orders can be blocked for Order Management (OMS) after the SOMS have been released. In this case the ship-to customer has no values in the ZVCUSTDATA table so it will rely on the OMS baseline quantity by class of trade on the ZVMUL table. The baseline quantity is 36 and the order quantity exceeds the baseline quantity so it blocks for OMS. (Logic was changed, orders stop and OMS for order adjustments 1st, and they block at SOMS if they still violate order qty.)



Schedule line Delivery block is set to ‘Order Management’.

Transaction VA14L can be used to view orders blocked for SOMS



Enter values 10 thru 13 in the Delivery block header field

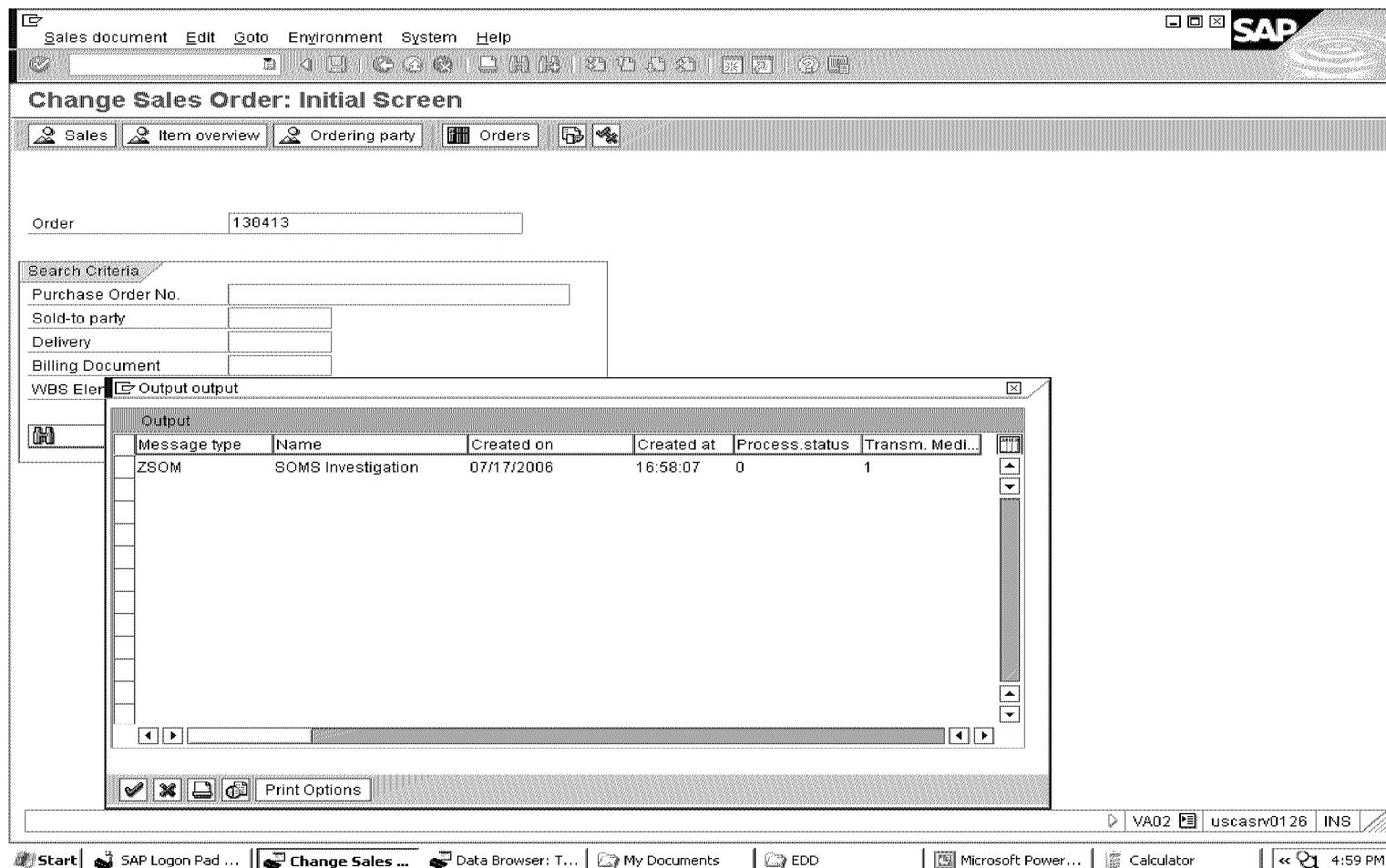
The screenshot shows a SAP application window titled "Sales and Distribution Documents Blocked for Delivery". The menu bar includes "List", "Edit", "Goto", "Settings", "System", and "Help". The toolbar contains various icons for document management. The main title bar says "Sales and Distribution Documents Blocked for Delivery". Below the title bar is a toolbar with icons for "Edit sales doc.", "Choose", and "Selections". The main content area displays a table titled "Sales and Distribution Documents Blocked for Delivery" with the following data:

SD Doc.	DelBlkDesc	D..	Req.dlv.dt	Sold-to pt	Ship-to	Sales document type	Header block	Item block	UsrStatBlk	CredChkBlk
130405	C Suspect (COT Aw/ord)	11	07/13/2006	1201563	1063472	Order	X	X		
130413	C Suspect (Cus Aw/mth)	12	07/17/2006	1075478	1000667	Order	X	X		

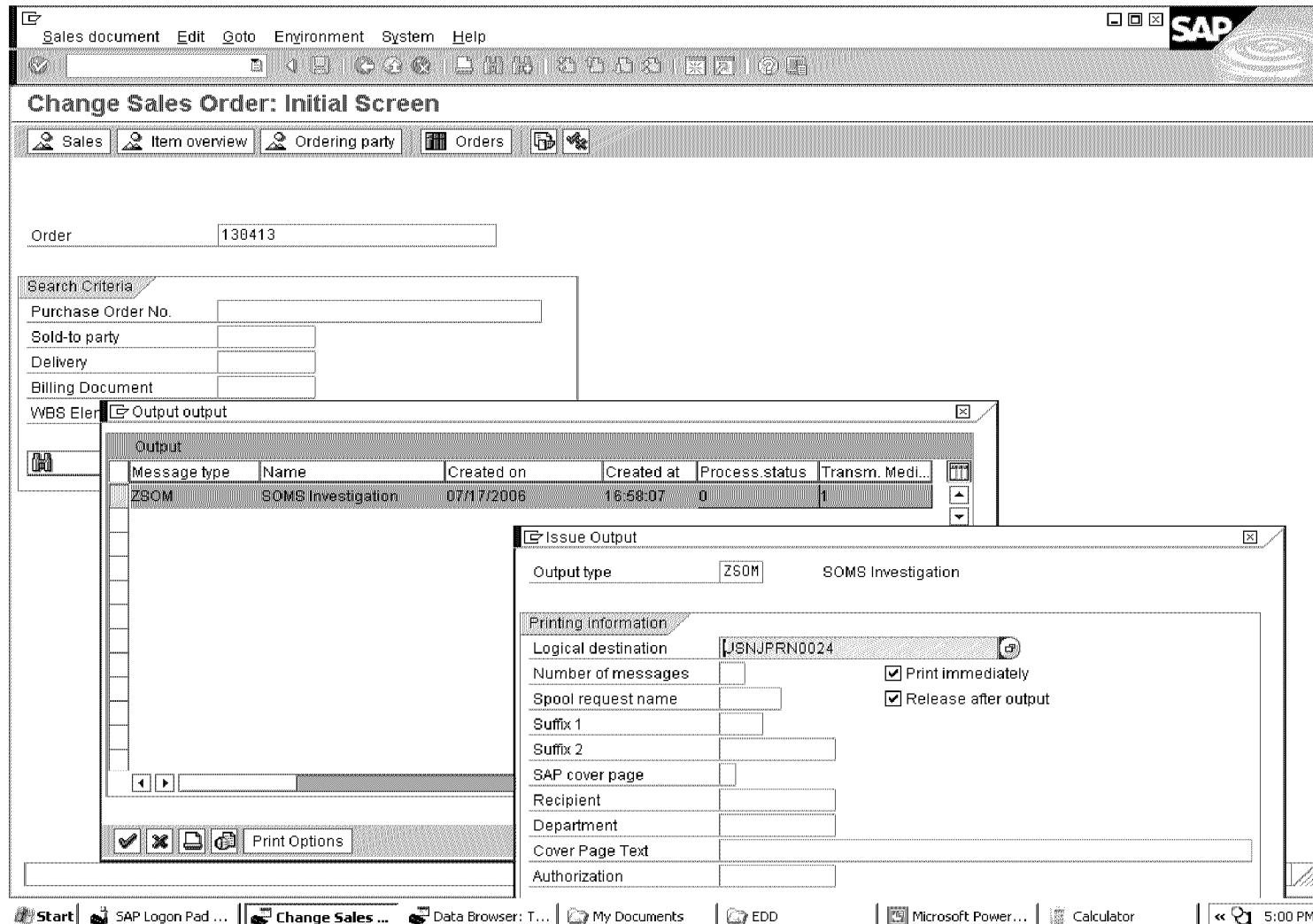
The status bar at the bottom shows "VA14L uscasrv0126 INS" and the system time "4:58 PM".

A list of orders blocked for SOMs is displayed. This transaction also allows changes to the order.

Printing the SOMS Investigation Form



Select Menu Path: Sales document> Issue Output
to using transaction VA02.



Click on Print Options. For the Test environment the Logical destination (printer id) needs to changed to your local printer.

SOMS Investigation Form



Print Preview of USCAPRN0191 Page 00001 of 00001

WATSON Pharma, Inc.

A Subsidiary of Watson Pharmaceuticals, Inc.
311 Bonnie Circle, P.O. Box 1900, Corona, CA 92878-1900
Tel: 800-272-5525 * Fax: 951-735-2871

SOMS Investigation Form

Sales Order Date	Purchase Order #	Order #
07/17/2006	Testing SOMS 4	130413

Sold To #: 1075478 Ship To #: 1000667

Name	D&K WHOLESALE DRUG	Name	WALSH HEARTLAND LLC
Street	8000 MARYLAND AVE	Street	#1 WALSH DR
City	ST LOUIS	City	PARAGOULD
State	MO 63105	State	AR 72450

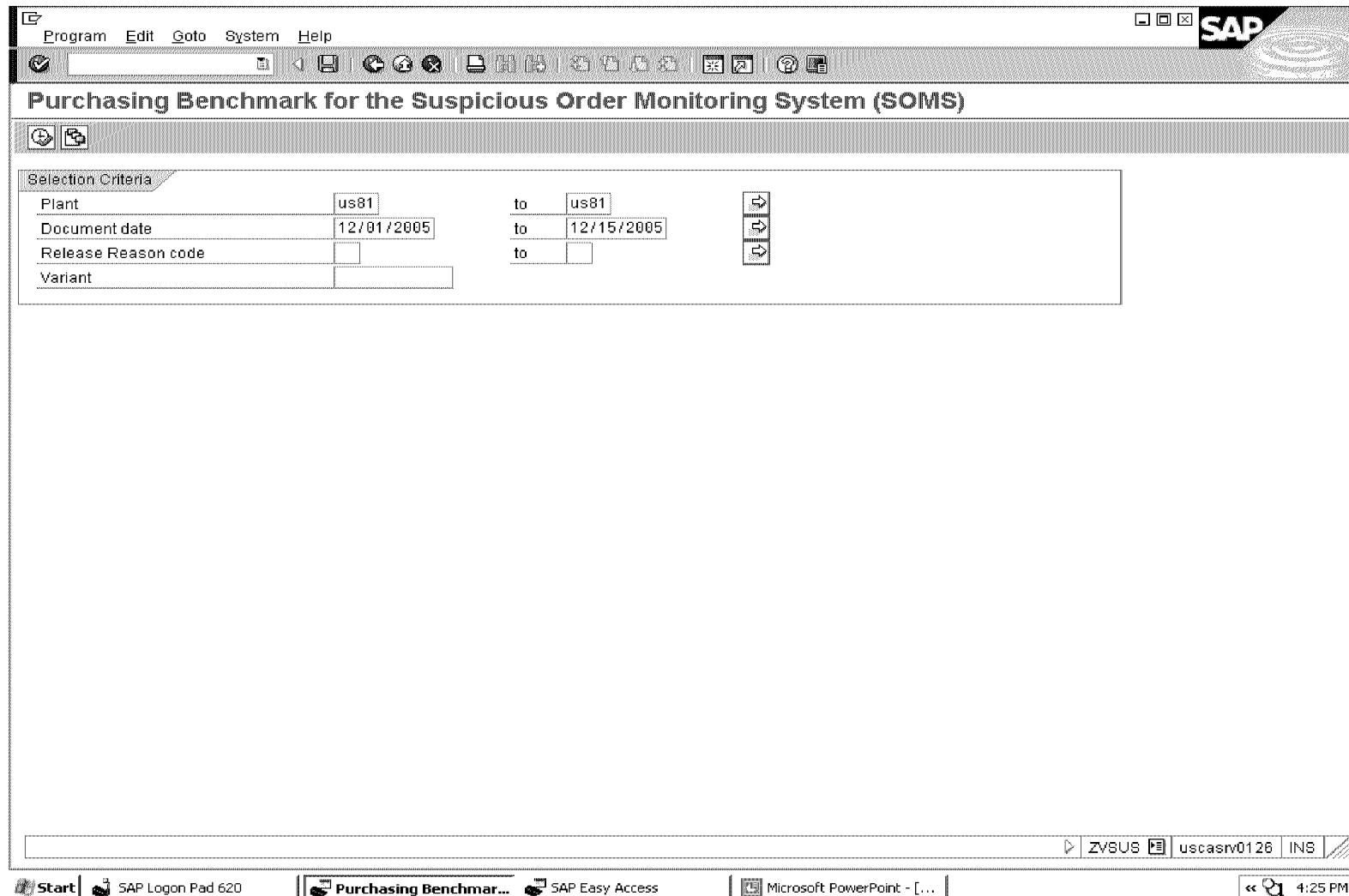
Item #	Material #	Description	Order Qty	Sales Unit	Description	COT Avg./ord	COT Avg./mth	Cust Avg./ord	Cust Avg./mth	MTD Qty	Release Qty	Reas:
10	00591024001	LORAZEPAM 0.5MG TAB 100	250	BTL	Suspect (Cus Av/mth)	8.9	9,730	17	42	0		

VAD0 uscasrv0126 INS

Start Karen Johnson - Inbox - ... My Documents Microsoft PowerPoint - [...] SAP Logon Pad 620 Print Preview of USCA... 8:22 AM

Class of Trade Average per Order, Class of Trade Average per Month, Customer Average per Order, Customer Average per Month and Month to Date values displayed on the SOMS Investigation Form are rounded to the next higher value. This form is used to document the authorization of SOMS Release code prior to actually entering Release code on the order.

Purchasing Benchmark for the Suspicious Order Monitoring System (SOMS) Transaction ZVSUS



SAP

Purchasing Benchmark for the Suspicious Order Monitoring System (SOMS)

System: WQ2 Watson Pharmaceuticals (Laboratories), Inc.
 Todays Date / Current Time: 07/14/2006 16:25:50 SOMS Release Activity
 User: KJOHNSON

Plant	Release Reason	Code	Release Code	Description	Sold To #	Ship To #	Ship To Name	Sales Order #	Item #	Material #	Description	Order Type
US81 01				Increased supply to new or existing customer/patient								
1060079	1060079	GENERAL INJECTABLES & VACCINE	128365	000010 00591085305 HYDROCODONE/APAP 10/325MG TAB 500	C	100						
1060079	1060079	GENERAL INJECTABLES & VACCINE	128365	000020 00591054005 HYDROCODONE/APAP 10/500MG TAB 500	C	100						
1060079	1060079	GENERAL INJECTABLES & VACCINE	128897	000010 00591085305 HYDROCODONE/APAP 10/325MG TAB 500	C	200						
1060079	1060079	GENERAL INJECTABLES & VACCINE	128897	000020 00591054005 HYDROCODONE/APAP 10/500MG TAB 500	C	200						
1075478	1039056	D&K HLTHCR RESOURCES/KY	128288	000030 00591562005 DIAZEPAM 10MG TAB 500	C	18						
1201047	1030704	J M BLANCO INC	128782	000010 52544095801 FIORICET/CODEINE 50/325/40/30MG CAP 100	C	8						
1201049	1061223	ANDA PHARMACEUTICALS INC	126094	000100 00591054001 HYDROCODONE/APAP 10/500MG TAB 100	C	4,84						
1201049	1061223	ANDA PHARMACEUTICALS INC	126094	000150 00591050301 HYDROCODONE/APAP 10/650MG TAB 100	C	5,10						
1201049	1061223	ANDA PHARMACEUTICALS INC	126094	000220 00591034901 HYDROCODONE/APAP 5/500MG TAB 100	C	1344						
1201049	1131869	ANDA INC	128906	000100 00591078301 DIETHYLPROPION HCL 25MG TAB 100	C	5,47						
1201049	1061223	ANDA PHARMACEUTICALS INC	128915	000090 00591078301 DIETHYLPROPION HCL 25MG TAB 100	C	4,92						
1201049	1061223	ANDA PHARMACEUTICALS INC	128915	000230 00591321901 BUTAL/ASA/CAFF 50/325/40MG CAP 100	C	144						
1201086	1201086	BLOODWORTH WHOLESALE DRUGS	126995	000020 00591078301 DIETHYLPROPION HCL 25MG TAB 100	C	432						
1201086	1201086	BLOODWORTH WHOLESALE DRUGS	127776	000010 00591078301 DIETHYLPROPION HCL 25MG TAB 100	C	144						
1201120	1307782	CARDINAL HEALTH	127683	000420 00591322801 HYDROCODONE/APAP 10/750MG TAB 100	C	192						
1201120	1307782	CARDINAL HEALTH	127849	000260 00591322801 HYDROCODONE/APAP 10/750MG TAB 100	C	156						
1201120	1307782	CARDINAL HEALTH	128953	000040 00591085305 HYDROCODONE/APAP 10/325MG TAB 500	C	636						
1201301	1061826	HENRY SCHEIN, INC	128078	000050 00591078301 DIETHYLPROPION HCL 25MG TAB 100	C	24						
1201364	1201364	KING DRUG CO OF FLORENCE	128532	000480 00591322379 TESTOSTERONE CYP INJ 200MG/ML 10ML V1 1	C	12						
1201364	1201364	KING DRUG CO OF FLORENCE	128533	000180 00591039501 PENTAZOCINE/NALOX HCL 50/0.5MG TAB 100	C	6						
1201368	1201368	KINRAY INC	128919	000980 00591085305 HYDROCODONE/APAP 10/325MG TAB 500	C	120						
1201399	1044381	MCKESSON-CENTRAL DEPOT	126235	000010 52544053901 NORCO 10/325MG TAB 100	C	3,64						
1201399	1040807	MCKESSON-MEMPHIS	126237	000010 00591074401 ESTAZOLAM 1MG TAB 100	C	19						
1201399	1044381	MCKESSON-CENTRAL DEPOT	127705	000010 52544053901 NORCO 10/325MG TAB 100	C	4176						
1201399	1002081	MCKESSON-NEW CASTLE	127751	000030 00591336570 LORAZEPAM 2MG/ML INJ 10ML VIAL 10X10ML	C	60						
1201399	1040807	MCKESSON-MEMPHIS	127769	000010 00591074401 ESTAZOLAM 1MG TAB 100	C	1						
1201423	1070093	MEDCO HEALTH SOLUTIONS-NV	128336	000040 00591320301 HYDROCODONE/APAP 7.5/325MG TAB 100	C	560						

ZVSUS uscasrv0126 INS

Start SAP Logon Pad 620 Purchasing Benchmark... SAP Easy Access Microsoft PowerPoint - ... 4:26 PM

This report captures the Soms Release Activity by Plant, Document date range and Release code values with pertinent information (Sold-to, Ship-to, Ship-to name, Sales Order #, Material, Description, etc..)

SAP

Purchasing Benchmark for the Suspicious Order Monitoring System (SOMS)

Watson Pharmaceuticals (Labs), Inc.

Page: 1 of 2

#	Item #	Material #	Description	Order Type	Qty Released	Qty Released	Date User Released	Goods Issue Date	
	customer/patient								
	000010	00591085305	HYDROCODONE/APAP 10/325MG TAB 500	C	100.000	100.000	12/14/2005	JLUU	12/16/2005
	000020	00591054005	HYDROCODONE/APAP 10/500MG TAB 500	C	100.000	100.000	12/14/2005	JLUU	12/16/2005
	000010	00591085305	HYDROCODONE/APAP 10/325MG TAB 500	C	200.000	200.000	12/16/2005	CWALDEN	12/19/2005
	000020	00591054005	HYDROCODONE/APAP 10/500MG TAB 500	C	200.000	200.000	12/16/2005	CWALDEN	12/19/2005
	000030	005910562005	DIAZEPAM 10MG TAB 500	C	18.000	18.000	12/14/2005	LSHAFFER	12/16/2005
	000010	52544095801	FIORICET/CODEINE 50/325/40/30MG CAP 100	C	8.000	8.000	12/16/2005	LSHAFFER	12/19/2005
	000100	00591054001	HYDROCODONE/APAP 10/500MG TAB 100	C	4,848.000	2,424.000	12/05/2005	CWALDEN	12/07/2005
	000150	00591050301	HYDROCODONE/APAP 10/650MG TAB 100	C	5,100.000	2,550.000	12/05/2005	CWALDEN	12/07/2005
	000220	00591034901	HYDROCODONE/APAP 5/500MG TAB 100	C	1344.000	1,344.000	12/05/2005	CWALDEN	12/07/2005
	000100	00591078301	DIETHYLPROPION HCL 25MG TAB 100	C	5,472.000	1,824.000	12/16/2005	CWALDEN	12/20/2005
	000090	00591078301	DIETHYLPROPION HCL 25MG TAB 100	C	4,920.000	1,640.000	12/16/2005	CWALDEN	12/20/2005
	000230	00591321901	BUTAL/ASA/CAFF 50/325/40MG CAP 100	C	144.000	144.000	12/16/2005	CWALDEN	12/20/2005
	000020	00591078301	DIETHYLPROPION HCL 25MG TAB 100	C	432.000	432.000	12/08/2005	CWALDEN	12/12/2005
	000010	00591078301	DIETHYLPROPION HCL 25MG TAB 100	C	144.000	144.000	12/12/2005	CWALDEN	
	000420	00591322801	HYDROCODONE/APAP 10/750MG TAB 100	C	192.000	192.000	12/12/2005	CWALDEN	
	000260	00591322801	HYDROCODONE/APAP 10/750MG TAB 100	C	156.000	156.000	12/13/2005	CWALDEN	12/15/2005
	000040	00591085305	HYDROCODONE/APAP 10/325MG TAB 500	C	636.000	636.000	12/16/2005	CWALDEN	12/19/2005
	000050	00591078301	DIETHYLPROPION HCL 25MG TAB 100	C	24.000	24.000	12/14/2005	LSHAFFER	12/15/2005
	000480	00591322379	TESTOSTERONE CYP INJ 200MG/ML 10ML V1	1	12.000	12.000	12/15/2005	LSHAFFER	12/20/2005
	000180	00591039501	PENTAZOCINE/NALOX HCL 50/0.5MG TAB 100	C	6.000	6.000	12/15/2005	LSHAFFER	12/17/2005
	000980	00591085305	HYDROCODONE/APAP 10/325MG TAB 500	C	120.000	120.000	12/16/2005	CWALDEN	12/20/2005
	000010	52544053901	NORCO 10/325MG TAB 100	C	3,648.000	360.000	12/05/2005	JLUU	12/08/2005
	000010	00591074401	ESTAZOLAM 1MG TAB 100	C	19.000	19.000	12/05/2005	LSHAFFER	12/06/2005
	000010	52544053901	NORCO 10/325MG TAB 100	C	4176.000	4,176.000	12/12/2005	CWALDEN	12/14/2005
	000030	00591336570	LORAZEPAM 2MG/ML INJ 10ML VIAL 10X10ML	C	60.000	60.000	12/12/2005	CWALDEN	12/13/2005
	000010	00591074401	ESTAZOLAM 1MG TAB 100	C	1.000	1.000	12/12/2005	LSHAFFER	12/13/2005
	000040	00591320301	HYDROCODONE/APAP 7.5/325MG TAB 100	C	560.000	560.000	12/14/2005	CWALDEN	12/15/2005

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Page 2 to capture all the data displayed within the Report.

Our Commitment to Preventing Diversion



As a responsible manufacturer and a good corporate citizen to the communities where we conduct business, Actavis takes its responsibility to prevent drug diversion very seriously.

Our commitment to preventing drug diversion is critical. Throughout our manufacturing and supply chain processes, we employ safeguards that work to ensure legitimate patients receive our medicines, while minimizing the risk of diversion.

By engaging all Actavis team members on dangers of prescription drug abuse and the many things we can do as a company to safeguard against diversion, we achieve our mission of providing high quality, critical medicines while preventing abuse.



